

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Leticia Vargas, Administrator of	)	
the Estate of Angel Cruz,	)	
	)	18-cv-1865
<i>Plaintiff,</i>	)	
	)	<i>(Judge Seeger)</i>
<i>-vs-</i>	)	
	)	
Sheriff of Cook County, et al.,	)	
	)	
<i>Defendants.</i>	)	

**JOINT STATUS REPORT**

The parties, by counsel, submit the following Joint Status Report pursuant to the Court's Order of May 26, 2020:

1. First, the parties apologize for their joint calendaring error that caused the delay in filing this report from its due date of July 31, 2020. Counsel are unable to offer a valid excuse for this error and respectfully request that the Court allow this instant filing.

2. Since the parties' Report of May 22, 2020, the parties have taken six depositions by remote means: Detective Sodt of the Countryside Police Department and five current and former Sheriff's employees (Michael Campbell, Robert Guerra, Timothy Holtz, Jerold Smith, and Dwight Anderson).

3. The parties have scheduled the following depositions: Officer Stern of Countryside for September 11, 2020, Dr. Zayed, who treated plaintiff's

decedent before he was admitted to the Jail, for September 23, 2020, and Wanda Estes, a nurse at the Jail, for September 24, 2020.

4. The continued deposition of a mental health care worker at the jail, Anita Johnson, was scheduled for August 26, 2020, but has been postponed by agreement to allow defendants to secure additional documents.

5. The parties are working to schedule the remaining depositions of Correctional Sergeant Crawford and six third-party health care providers employed at Hinsdale Hospital, who interacted with plaintiff's decedent shortly before he was transferred to the Cook County Jail.

6. The parties believe that these depositions can be scheduled and completed by November 13, 2020.

Respectfully submitted,

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