

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

JOINT MOTION TO CONCLUDE OUT-OF-TIME DEPOSITION

Plaintiff and defendant Anita Johnson, by counsel, seek leave of court to complete Ms. Johnson's deposition one business day after the discovery deadline of November 13, 2020.

Grounds for this motion are as follows:

1. Plaintiff began the deposition of defendant Anita Johnson on September 20, 2019.

2. At the request of Johnson's counsel, plaintiff agreed to continue the deposition and postpone questioning Johnson on a single area to allow Johnson and her counsel to confer with an attorney who represented Johnson in relation to that area.

3. The parties scheduled the continued deposition of Johnson for August 26, 2020, but they agreed to postpone it to allow Johnson's counsel to search for additional documents relevant to the deposition.

4. Counsel has almost completed the search as of the time of this motion, and the parties have agreed to complete Johnson's deposition on November 16, 2020, subject to leave of Court.

ACCORDINGLY, plaintiff and defendant Johnson respectfully request that the Court permit the parties to complete the deposition of defendant Anita Johnson on November 16, 2020.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
Attorneys for Plaintiff

/s/ William R. Ragen (with consent)
William R. Ragen
Assistant State's Attorney
Civil Rights Section
500 Richard J. Daley Center
Chicago, Illinois 60602
(312) 603-7944
*Attorney for Cook County and
Individually Named Cook
County Employees, including
Anita Johnson*