

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

Robert Forney,)
)
Plaintiff)
) No. 18-cv-3474
-vs-)
) (*Judge Kendall*)
City of Chicago, et al.,)
)
Defendants.)

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court’s Order of May 31, 2023. As explained further below, no action is currently required by the District Judge assigned to this case.

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 100 cases that are coordinated for pretrial proceedings. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

On January 20, 2023, the parties submitted a joint status report in the coordinated proceedings, indicating that the parties have agreed on a list of 19 proposed “test cases.” ECF No. 393 in Case No. 19-cv-1717. The parties will focus on litigating the 19 “test cases” to their conclusion to help the parties assess the value and merit of the remaining cases. This case is not one of the test cases.

On February 13, 2023, Magistrate Judge Finnegan set a fact discovery deadline in the test cases of December 18, 2023. ECF No. 419 in Case No. 19-cv-1717.

On April 13, 2023, Magistrate Judge Finnegan stayed discovery in non-test cases, including this one, for at least six months, when the issue will be revisited. ECF No. 491 in Case No. 19-cv-1717.

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/ Paul A. Michalik (by consent)

Daniel M. Noland
Terrence M. Burns
Paul A. Michalik
Katherine C. Morrison
Daniel J. Burns
Dhaviella N. Harris
Reiter Burns LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090
*attorneys for defendants City of
Chicago, Philip Cline, and Debra
Kirby*

/s/ Brian P. Gainer (by consent)

Brian P. Gainer
Monica Gutowski
Johnson & Bell, Ltd.
33 West Monroe St., Ste 2700

Chicago, IL 60603
(312) 372-0770
attorneys for defendant Ronald Watts

/s/ Eric S. Palles (by consent)
Eric S. Palles
Sean M. Sullivan
Daley Mohan Groble P.C
55 West Monroe St., Ste 1600
Chicago, IL 60603
(312) 422-9999
attorneys for defendant Mohammed

/s/ Kelly M. Olivier (by consent)
Special Assistant Corporation Counsel
William E. Bazarek
Andrew M. Hale
Anthony E. Zecchin
Brian J. Stefanich
Allyson L. West
Kelly M. Olivier
Hale & Monico LLC
53 West Jackson Blvd., Ste 334
Chicago, IL 60604
(312) 341-9646
attorneys for remaining defendants