

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

Goleather Jefferson,)	
)	No. 18-cv-8182
<i>Plaintiff</i>)	
)	(<i>Judge Hunt</i>)
- <i>vs</i> -)	
)	
City of Chicago, et al.)	
)	
<i>Defendants</i>)	

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of April 30, 2025:

Status of discovery in this case: All defendants have answered written discovery, and plaintiff questioned defendant Jones about this case at his deposition on May 7, 2025.

Counsel for plaintiff and defendant Mohammed have conferred about Mohammed's supplemental written discovery, and plaintiff expects to answer the supplemental discovery on or before May 23, 2025.

The deposition of Willie Martin is scheduled for June 2, 2025. Mr. Martin was arrested at the same time as plaintiff. Defendants state that they may seek to depose Kevin Ochalla, the Assistant Public Defender who represented plaintiff at his guilty plea hearing.

Settlement: The parties are communicating about settlement of various cases that were previously part of the Watts Consolidated Proceedings, with the assistance of Magistrate Judge Valdez. The Court entered a settlement referral to Magistrate Judge Valdez on March 4, 2025. The next conference with Magistrate Judge Valdez is scheduled for June 3, 2025.

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
Burns Noland LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090
*attorneys for defendants Chicago,
Cline, and Kirby*

/s/ Brian P. Gainer (by consent)
Brian P. Gainer
Monica Burkoth
Lisa M. McElroy

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
Lisa Altukhova
Mohan Groble Scolaro, PC
55 West Monroe St., Ste 1600
Chicago, IL 60603
(312) 422-9999
attorneys for defendant Mohammed

/s/ Jason M. Marx (by consent)
Special Assistant Corporation
Counsel
Andrew M. Hale
Anthony E. Zecchin
Jason M. Marx
Kelly M. Olivier
Hannah Beswick-Hale
Hale & Monico LLC
53 West Jackson Blvd., Ste 334
Chicago, IL 60604
(312) 341-9646
attorneys for remaining defendants