

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

Margaret Thomas, as special)
administrator for Nephus Thomas,)
deceased,)
)
Plaintiff) 19-cv-133
)
-vs-) (*Judge Pallmeyer*)
)
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 April 8, 2025:

Defendants took the deposition of a non-party witness, Jordan Key, on June 12, 2025. The parties have postponed the other depositions to focus on settlement negotiations.

The parties are communicating about settlement of various cases that were previously part of the Watts Coordinated Proceedings, with the assistance of Magistrate Judge Valdez. The next conference with Magistrate Judge Valdez is scheduled for June 24, 2025.

In the event settlement negotiations are unsuccessful by July 3, 2025, the current fact discovery deadline, the parties anticipate filing a motion to extend said deadline in order to complete depositions.

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 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