

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

Nephus Thomas,	)	
	)	
<i>Plaintiff</i>	)	19-cv-00133
	)	
-vs-	)	(Chief Judge Pallmeyer)
	)	
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 October 7, 2020.

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 73 cases that are coordinated for pretrial proceedings. The proceedings were originally assigned to Judge Wood. The Executive Committee transferred the proceedings to Judge Valderrama on October 14, 2020. Magistrate Judge Finnegan is supervising discovery.

The parties in the consolidated proceedings are actively engaged in discovery. To date, they have exchanged thousands of pages of documents and taken over sixty depositions.

On September 18, 2020, Judge Wood entered a Case Management Order in the Coordinated Proceedings, stating that responsive pleadings and/or motions to dismiss would be due in all pending cases in the

Coordinated Proceedings, including this one, by the October 15, 2020. Judge Wood's order also directed the parties to meet and confer to develop an updated plan regarding responsive pleadings that would avoid successive, duplicative briefing.

In accordance with that order, the parties submitted a proposed agreed plan to Judge Wood concerning the filing and briefing of motions to dismiss and filing of answers to complaints. The proposed agreed plan, which was filed in the Coordinated Proceedings on September 30, 2020, is now pending before Judge Valderrama.

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/ Ahmed Kosoko (with consent)
Brian P. Gainer
Monica Gutowski
Ahmed Kosoko
Special Assistant Corporation Counsel
Johnson & Bell, Ltd.
33 West Monroe St., Ste 2700
Chicago, IL 60603
(312) 372-0770
attorneys for defendant Ronald Watts

/s/ Kathryn M. Doi (with consent)

Eric S. Palles

Gary Ravitz

Sean M. Sullivan

Kathryn M. Doi

Special Assistant Corporation Counsel

Daley Mohan Groble P.C

55 West Monroe St., Ste 1600

Chicago, IL 60603

(312) 422-9999

attorneys for defendant Kallatt Mohammed

/s/ Paul A. Michalik (with consent)

Daniel M. Noland

Terrence M. Burns

Paul A. Michalik

Elizabeth A. Ekl

Katherine C. Morrison

Special Assistant Corporation Counsel

Reiter Burns LLP

311 S. Wacker Dr., Suite 5200

Chicago, IL 60606

(312) 982-0090

attorneys for defendant City of Chicago, Philip Cline, and Debra Kirby

/s/ William E. Bazarek (with consent)

William E. Bazarek

Andrew M. Hale

Anthony E. Zecchin

Brian J. Stefanich

Allyson L. West

Special Assistant Corporation Counsel

Hale & Monico LLC

53 West Jackson Blvd., Ste 330

Chicago, IL 60604

(312) 341-9646

attorneys for remaining defendants