

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

Margaret Thomas, as special	)	
administrator for Nephus	)	
Thomas, deceased,	)	
	)	
<i>Plaintiff</i>	)	19-cv-133
	)	
<i>-vs-</i>	)	<i>(Chief Judge Pallmeyer)</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 July 26, 2021:

1. This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 75 cases that are coordinated for pretrial proceedings.

2. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

3. Written and oral discovery are ongoing in the Coordinated Proceedings under the following schedule: fact discovery concludes on May 31, 2022; expert discovery concludes on December 5, 2022; and dispositive motions shall be filed by December 5, 2022.

4. The parties in the consolidated proceedings are actively engaged in discovery.

5. To date, the parties have exchanged thousands of pages of documents and taken over 75 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/ Ahmed Kosoko (by consent)

Brian P. Gainer  
Monica Gutowski  
Ahmed Kosoko  
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  
Kathryn M. Doi  
Tyler E. Roland  
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 (by consent)

Daniel M. Noland  
Terrence M. Burns  
Paul A. Michalik  
Elizabeth A. Ekl  
Katherine C. Morrison  
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/ William E. Bazarek (by consent)

Special Assistant Corporation  
Counsel  
Andrew M. Hale  
Anthony E. Zecchin  
Brian J. Stefanich  
Allyson West  
Kelly Olivier  
Hale & Monico LLC  
53 West Jackson Blvd., Ste 330  
Chicago, IL 60604  
(312) 341-9646

*attorneys for remaining defendants*