

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

**PLAINTIFF'S RESPONSE TO
"DEFENDANT'S STATUS REPORT"**

The Court, on March 18, 2025, ordered the parties to submit a joint status report on May 1, 2025. Plaintiff shared with defendant a proposed status report in the early afternoon of May 1, 2025; defendant responded late in the afternoon with proposed additions that included erroneous factual assertions about the unsuccessful attempts to settle. Defendant refused to negotiate about the contents of the joint status report and filed its version late on May 1, 2025.

Paragraphs one and two of defendant's status report are correct. Paragraph three is false and misleading.

The parties represented on January 17, 2025 (ECF No. 132) that there was an agreement “subject to formal approval by IDOC.” The IDOC has refused to approve any settlement that does not include a new provision to which plaintiff did not and will not agree.

Plaintiff's counsel reported to the Court at the status hearing on March 18, 2025 that the case was not settled. Defense counsel did not appear at that hearing and did not, until filing its "status report" late on May 1, 2025, dispute that the

attempts to settle the case were unsuccessful. Defendant has slept on any rights it may have to enforce the incomplete settlement.

Respectfully submitted,

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