

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

	)	
	)	Master Docket Case No. 19-cv-01717
In re: WATTS COORDINATED	)	
PRETRIAL PROCEEDINGS	)	Judge Andrea R. Wood
	)	
	)	Magistrate Judge Sheila M. Finnegan
	)	

THIS DOCUMENT RELATES TO ALL CASES

**JOINT STATUS REPORT**

All parties to the coordinated proceedings respectfully submit the following joint status report:

**Progress of Discovery**

1. The parties have continued to engage in written discovery and have continued to engage in the Rule 37.2 meet and confer process on various issues.
2. The parties have conducted approximately 52 depositions, including two remote videoconference depositions since the stay-at-home order has been put in place. By agreement, Plaintiffs also plan to depose a Defendant via videoconference on May 18 and May 21, 2020. The parties have and will continue to confer regarding other depositions that may be appropriate to conduct via video.

**Pending Motions**

3. As set forth below, there are three pending motions in the Coordinated Proceedings or individual cases that are a part of the Coordinated Proceedings. Pursuant to paragraph 5(f) of the Third Amended General Order 20-0012, the parties submit that the two

fully briefed motions may be resolved without a hearing. Judge Finnegan has indicated that she will decide whether the final motion requires a hearing once briefing is completed.

4. The first filed case in these coordinated proceedings was *Baker & Glenn v. City of Chicago*, No. 16 CV 8940. The Defendants' January 3, 2017 motion to dismiss (Baker Dkt. 67) is fully briefed, and the parties agree that it may be decided without a hearing. By Court order in the Coordinated Proceedings, the deadline for Defendants to respond to the complaints in any cases filed under these Coordinated Proceedings has been extended until 45 days after the *Baker* motion to dismiss is resolved. (Coordinated Dkt. 12 ¶1). Accordingly, no additional responsive pleadings have been filed in most of the Coordinated cases.

5. Plaintiffs' September 9, 2019 motion to compel the production of grand jury and Title III materials from the criminal proceedings brought against Ronald Watts and Kallat Mohammed is fully briefed and remains pending. (Coordinated Dkt. 46). The portion of the motion pertaining to grand jury materials is pending in front of Chief Judge Pallmeyer. The matters pertaining to Title III materials is pending in front of Judge Wood. The parties submit that this motion may also be resolved without a further hearing.

6. Plaintiffs filed a Motion for a Protective Order seeking to prohibit the Defendants from asking about uncharged alleged criminal activity at Plaintiffs' depositions. The Defendants' response was filed on May 8, 2020. Plaintiffs filed a reply on May 15, 2020. The matter is in front of Magistrate Judge Finnegan, who has indicated that she will either rule on the papers or set a hearing. (Coordinated Dkt. 136).

#### **Settlement Efforts**

7. There are no current settlement discussions in any case.

### **Other Matters**

8. Since the last status report, the Law Office of Kenneth N. Flaxman, P.C. has filed two new cases:

*Adams v. City of Chicago*, 20 CV 1896

*Moye v. City of Chicago*, 20 CV 1897

9. Since the last status report, the Loevy & Loevy Law Firm has filed eight new cases:

*Ali v. City of Chicago*, 20 CV 2914

*Farrris v. City of Chicago*, 20 CV 2917

*Harrison v. City of Chicago*, 20 CV 2918

*Nile v. City of Chicago*, 20 CV 2922

*Potts v. City of Chicago*, 20 CV 2925

*Mayberry v. City of Chicago*, 20 CV 2926

*Molette v. City of Chicago*, 20 CV 2927

*Robinson v. City of Chicago*, 20 CV 2928

### **Proposed Schedule**

10. The parties do not believe any specific schedule need be set for the next 45 days. The parties will continue to conduct written discovery and depositions that are appropriate to conduct via video. The parties are waiting to conduct certain depositions that may concern the federal criminal investigation until rulings on Plaintiff's motion for grand jury and Title III materials.

11. Fact discovery was scheduled to conclude on June 9, 2020 in certain cases before the automatic extensions set by the Court's General Orders regarding COVID-19. The parties

understand that the COVID-19 General Orders have extended that deadline to August 25, 2020.

The Court has not yet set an expert discovery or dispositive motion deadline. In light of the pandemic, the need to resolve pending motions, and the additional written and oral discovery that needs to be conducted in the cases, the parties request that the Court vacate the current fact discovery deadline. The parties jointly request that Judge Finnegan set a status hearing for a date 60-90 days in the future to discuss a new fact discovery closure date. The parties are not requesting that this Court set expert discovery or dispositive motion deadlines at this time. The parties do not believe a hearing is necessary on this request, or any other issue, unless requested by the court.

Respectfully submitted,

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