

**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 Franklin U. Valderrama
)	
)	Magistrate Judge Sheila M. Finnegan
)	

THIS DOCUMENT RELATES TO ALL CASES

JOINT STATUS REPORT WITH PROPOSED DISCOVERY SCHEDULE

All parties to the coordinated proceedings respectfully submit the following joint status report pursuant to Magistrate Judge Finnegan's November 12, 2020 Order:

1. There are currently 73 individual cases in the Coordinated Proceedings.
2. Since the COVID pandemic began, the parties have done their best to continue with discovery, including depositions.
3. The parties have now conducted more than 60 depositions and have exchanged multiple rounds of written discovery and tens of thousands of pages of documents. There is however, much discovery to be completed, including party depositions and additional document discovery. To avoid duplication of efforts, Defendants have held off on deposing Plaintiffs until the Court rules on the Loevy Plaintiffs' pending motion for protective order. In addition, although Plaintiffs have commenced the depositions of most Defendants, they have not yet completed deposing each Defendant about each individual case.
4. The below proposed cut-off dates do not contemplate that additional lawsuits that may be filed in the Watts Coordinated Pretrial Proceedings, if any, will necessarily be concluded on the same schedule.

5. The parties propose the following schedule to complete discovery and to file dispositive motions in the Coordinated Proceedings:

- a. Fact discovery: May 31, 2022
- b. Plaintiffs' expert disclosures: June 30, 2022
- c. Depositions of Plaintiffs' experts completed: August 1 2022
- d. Defendants' expert disclosures: September 1, 2022
- e. Depositions of Defendants' experts completed: October 3, 2022
- f. Rebuttal expert disclosures: November 3, 2022
- g. Rebuttal expert depositions completed: December 5, 2022¹
- h. Dispositive motions: December 5, 2022.

6. The parties also propose that they conduct discovery concerning the Individual Defendants' financial condition – relevant for punitive damages – after summary judgment (or after the time for summary judgment has passed in the event that the Individual Defendants do not move for summary judgment).

Respectfully submitted,

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¹ Depending on the number of experts disclosed, the parties may need to request that the Court modify the proposed schedule for expert discovery.

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