

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

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,

/s/ Scott Rauscher

One of the Attorneys for the Plaintiffs Represented by Loevy & Loevy in the Coordinated Proceedings

Arthur Loevy
Jon Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
Loevy & Loevy
311 N. Aberdeen St., Third Floor
Chicago, IL 60607

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

/s/ Joel A. Flaxman

One of the Attorneys for Plaintiffs Represented by Kenneth N. Flaxman, P.C. in the Coordinated Proceedings

Joel A. Flaxman
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200

/s/ William E. Bazarek

Special Assistant Corporation Counsel
One of the Attorneys for Defendants Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nichols, Jr., Manuel S. Leano, Brian Bolton, Kenneth Young, Jr., David Soltis, Elsworth J. Smith, Jr., John Rodriguez, Gerome Summers, Jr., Calvin Ridgell, Jr., Lamonica Lewis, Rebecca Bogard, Frankie Lane, Katherine Moses-Hughes, Darryl Edwards, and Nobel Williams

Andrew M. Hale
William E. Bazarek
Anthony E. Zecchin
Brian J. Stefanich
Allyson L. West
HALE & MONICO LLC
Special Assistant Corporation Counsel
53 W. Jackson Blvd., Suite 330
Chicago, IL 60604
(312) 341-9646

/s/ Eric S. Palles

Special Assistant Corporation Counsel
One of the Attorneys for Defendant Kallatt Mohammed

Gary Ravitz
Eric S. Palles
Sean M. Sullivan
Daley Mohan Groble PC
55 W. Monroe Street, Suite 1600
Chicago, Illinois 60603
(312) 422-9999

/s/ Ahmed Kosoko

Special Assistant Corporation Counsel
One of the Attorneys for Defendant Ronald Watts

Brian P. Gainer
Monica Gutowski
Ahmed Kosoko
JOHNSON & BELL, LTD.
33 West Monroe Street
Suite 2700
Chicago, Illinois 60603
(312) 372-0770

/s/ Daniel M. Noland

Special Assistant Corporation Counsel
One of the Attorneys for Defendants
City of Chicago, Philip Cline, Debra Kirby, Karen Rowan, Jerrold Bosak, Dana Starks, and
Terry Hillard

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Elizabeth A. Ekl
Katherine C. Morrison
Reiter Burns LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090

/s/ James V. Daffada

Special Assistant Corporation Counsel
One of the Attorneys for Defendants Michael Spaargaren and Matthew Cadman

James V. Daffada
Thomas M. Leinenweber
Kevin E. Zibolski
Michael J. Schalka
Leinenweber Baroni & Daffada LLC
120 North LaSalle Street
Suite 2000
Chicago, Illinois 60602
(312) 663-3003