

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

THIS DOCUMENT RELATES TO ALL CASES

JOINT STATUS REPORT

All parties to the coordinated proceedings respectfully submit the following joint status report pursuant to Magistrate Judge Finnegan's February 2, 2021 Order:

1. Since filing their February 1, 2021 status report, the parties have continued to engage in oral and written discovery (serving additional written discovery requests and producing additional responsive documents), and have continued to engage in the meet and confer process with respect to certain discovery issues.

2. Defendants have begun deposing the Plaintiffs, and Plaintiffs have continued to schedule and depose Defendants and third parties.

3. On December 11, 2020, Defendants filed two partial motions to dismiss. As of March 18, 2021, those motions are fully briefed. *See* Dkt. 197. In addition, the portion of Plaintiffs' motion for the disclosure of certain materials from the federal prosecution of Defendants Watts and Mohammed remains pending before Judge Valderamma with respect to the request for Title III recordings. *See* Dkts. 46, 60, 65. Judge Pallmeyer previously ruled on the portion of the motion requesting grand jury materials from that prosecution. *See* Dkt. 153 at 1 n.

1 (noting that “Plaintiffs’ motion also seeks Title III wiretaps; that aspect of the motion is before Judge Wood.”).

4. The parties do not currently have any disputes that they wish to raise with the Court.

Respectfully submitted,

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