

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

)  
) No. 19-cv-1717  
In re: Watts Coordinated Pretrial )  
Proceedings ) (*Judge Valderrama*)  
)  
) (*Magistrate Judge Finnegan*)

**PLAINTIFFS' RESPONSE TO DEFENDANT  
RIDGELL'S MOTION FOR PROTECTIVE ORDER**

Defendant Ridgell has filed a lengthy motion for protective order based on the mistaken premise that plaintiffs intend to ask deposition questions that will invade the psychotherapist-patient privilege and the attorney-client privilege. Plaintiffs have no such intention, and defendant provides no basis for departure from the ordinary rule that privilege issues are decided on a question-by-question basis. *See United States v. Lawless*, 709 F.2d 485, 487 (7th Cir. 1983).

Defendant concedes that plaintiffs may ask “standard questions” about his ability to understand deposition questions, give answers, and recall past events. (ECF No. 653 at 5.) But there is no basis for defendant’s argument that a privilege bars any and all questioning about Ridgell’s earlier objection that he could not proceed with his deposition because of a medical condition. The Court overruled this objection on June 15, 2023. (ECF No. 520.)

The Court has ordered that Ridgell's deposition be taken in the Court's jury room. (ECF No. 643.) To the extent defendant objects to any question as calling for privileged information, the Court can promptly resolve that objection when it is raised.

Accordingly, the Court should deny defendant's motion.

Respectfully submitted,

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