

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)	Judge Andrea R. Wood
PRETRIAL PROCEEDINGS)	
)	Magistrate Judge Sheila M. Finnegan
)	

THIS DOCUMENT RELATES TO
BOBBY COLEMAN v. CITY OF CHICAGO et al., No. 19-cv-01094

PLAINTIFF BOBBY COLEMAN'S RULE 26(a)(1) DISCLOSURES

Rule 26(a)(1)(A)(i). Individuals likely to have discoverable information that Plaintiff may rely on to support his claim¹:

1. Bobby Coleman, Plaintiff, can be reached through Plaintiff's counsel;
2. Ronald Watts, Defendant, can be reached through Defendants' counsel;
3. Kallatt Mohammed, Defendant, can be reached through Defendants' counsel;
4. Brian Bolton, Defendant, can be reached through Defendants' counsel;

¹ With regard to Plaintiff's *Monell* Claim, Plaintiff incorporates herein by reference the individuals listed in Coordinated Plaintiffs' February 4, 2019 Rule 26(a)(1) Disclosures propounded in *Baker et al. v. City of Chicago, et al.*, 16-cv-8940, and as supplemented or amended thereafter.

5. Kenneth Young, Jr., Defendant, can be reached through Defendants' counsel;

6. Darryl Edwards, Defendant, can be reached through Defendants' counsel;

7. Matthew Cadman, Defendant, can be reached through Defendants' counsel;

8. Michael Spaargaren, Defendant, can be reached through Defendants' counsel;

9. Gerome Summers, Jr., Defendant, can be reached through Defendants' counsel;

10. Calvin Ridgell, Defendant, can be reached through Defendants' counsel;

11. Alvin Jones, Defendant, can be reached through Defendants' counsel;

12. Terry Hillard, Defendant, can be reached through Defendants' counsel;

13. Phillip Cline, Defendant, can be reached through Defendants' counsel;

14. Debra Kirby, Defendant, can be reached through Defendants' counsel;

15. Karen Rowan, Defendant, can be reached through Defendants' counsel;

16. Officer Gonzales, # 12155, has knowledge of the circumstances of plaintiff's arrest and can be reached through Defendants' counsel;

17. Officer Scroggins, # 6995, has knowledge of the circumstances of plaintiff's arrest and can be reached through Defendants' counsel;

18. Yolanda Toppins, Office of Professional Standards, has knowledge of the registration of plaintiff's Complaint with O.P.S. Her address and telephone number are currently unknown;

19. Neomi Hernandez, O.P.S. Investigator, has knowledge of the O.P.S. investigation into Plaintiff's O.P.S. complaint. Her address and telephone number are currently unknown;

20. Jessica Rodriguez, O.P.S. Investigator, has knowledge of the O.P.S. investigation into Plaintiff's O.P.S. complaint. Her address and telephone number are currently unknown;

21. Leonard Gipson has knowledge of the circumstances of Plaintiff's arrest. He can be reached through Plaintiff's counsel;

22. Clifford Roberts has knowledge of the circumstances of Plaintiff's arrest. He can be reached through Plaintiff's counsel;

23. Marc Giles has knowledge of the circumstances of Plaintiff's

arrest. He can be reached through Plaintiff's counsel;

24. Larry Lomax has knowledge of the circumstances of Plaintiff's arrest. He can be reached through Plaintiff's counsel;

25. Shaban Thomas has knowledge of Plaintiff's damages. Her current address is unknown and telephone number is [REDACTED]

26. Nicole Parker has knowledge of the circumstances of Plaintiff's arrest. She can be reached through Plaintiff's counsel;

27. Rosco Bryson has knowledge of the circumstances of Plaintiff's arrest. His current address and telephone number are unknown;

28. Erika Hill has knowledge of Plaintiff's damages. Her address is [REDACTED] and her telephone number is currently unknown.

Plaintiff's investigation continues. Plaintiff reserves the right to modify and supplement his disclosures as more information becomes available.

ii. The following documents, data compilations and tangible things in the possession, custody, or control of the Plaintiff may be used to support Plaintiff's claims or defense:

These documents include, *inter alia*, police reports, O.P.S. documents, criminal court records, criminal hearing and trial transcripts, post-conviction petitions, post-conviction transcripts, judicial rulings and opinions, pleadings

in Plaintiff's Certificate of Innocence proceedings, and other documents.

Plaintiff's investigation continues. Plaintiff reserves the right to modify and supplement his disclosures as more information becomes available.

iii. Plaintiff has suffered and continues to suffer incalculable damage, including psychological damage, anguish and humiliation which were caused by his wrongful conviction and loss of freedom, the destruction of his reputation, the disruption of his life and intimate relationships, and the suspension of his ability to pursue a career and raise a family. Plaintiff seeks compensatory damages from all Defendants and punitive damages from the Individual Defendants. A jury or juries will determine the appropriate amount of these damages. At this time, Plaintiff has not made any computation of his damages.

In addition, Plaintiff will seek attorneys' fees, costs and expenses pursuant to 42 U.S.C. § 1983.

Respectfully submitted,

/s/ Scott Rauscher

Arthur Loevy
Jon Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
LOEVY & LOEVY
311 North Aberdeen Street, 3rd Floor
Chicago, IL 60607
(312) 243-5900
scott@loevy.com