

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*)

This Document Relates to *Carter v. Chicago*, 17-cv-7241

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Judge Maldonado's Order of March 5, 2024 in Case Number 17-cv-7241:

1. Status of discovery in the consolidated proceedings and proposed expert discovery schedule

Fact discovery in the test cases, including this one, is closed other than certain depositions that Magistrate Judge Finnegan has allowed to continue past the discovery cutoff. Expert deadlines have not been set in the coordinated proceedings, and therefore the parties propose expert deadlines for this case as follows:

Plaintiff proposes the following schedule for expert discovery, which includes a deadline for rebuttal disclosures, which are specifically contemplated by Federal Rule of Civil Procedure 26(a)(2)(D)(ii).

Plaintiff's expert disclosures	July 19, 2024
Plaintiff's expert deposed	August 16, 2024
Defendants' expert disclosures	September 13, 2024

Defendants' experts deposited	October 11, 2024
Rebuttal expert disclosures	October 25, 2024

Defendants propose the following schedule for expert discovery:

Plaintiff's expert disclosures	August 2, 2024
Plaintiff's expert deposited	August 30, 2024
Defendants' expert disclosures	September 27, 2024
Defendants' experts deposited	October 25, 2024

Defendants suggest that, given the tight expert and scheduling deadlines being proposed, the issue of the need for rebuttal experts can be better addressed following the discovery related to defendants' experts.

2. Proposed briefing schedule for summary judgment and *Daubert* motions

The parties agree on the following schedule for briefing summary judgment and *Daubert* motions:

Summary judgment and <i>Daubert</i> motions (set by ECF No. 158)	November 22, 2024
Responses on summary judgment and <i>Daubert</i> motions	December 23, 2024
Replies on summary judgment and <i>Daubert</i> motion	January 13, 2024

3. Any other matters

Defendants wish to advise the Court of the likely need to request the trial date in the *Carter* case be rescheduled to a later date given significant conflicts between the above proposed schedule and trial date in this matter with previously scheduled trial dates and deadlines in the *Baker* case (16-

cv-8940) and *Gipson* case (18-cv-5120). For example, there is a high likelihood the *Gipson* matter will still be on trial on the date of the pretrial conference scheduled in *Carter* (5/8/25). While plaintiff's counsel in *Carter* is not involved in the *Gipson* matter, the undersigned defense counsel will be involved in that trial. As another example, briefing on summary judgment and Daubert motions in *Carter* will overlap with the trial in the *Baker* case. In light of the foregoing, defendants propose an in-person hearing before the Court to discuss the scheduled trial date and other dates.

Plaintiff does not agree to rescheduling the trial date in this case that has been pending since 2017.

Respectfully submitted,

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