

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
) Master Docket Case No. 19-cv-01717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

THIS DOCUMENT RELATES TO *WHITE SR. V.*
CITY OF CHICAGO, ET AL., CASE NO. 17-CV-2877

**JOINT STATUS REPORT REGARDING PROPOSED EXPERT AND
SUMMARY JUDGMENT DEADLINES**

Pursuant to the order that Judge Maldonado entered *White Sr. v. City of Chicago, et al.*, (No. 17-cv-2877) on March 5, 2024, all parties to the *White Sr.* case respectfully submit this status report with (1) an update on discovery in the consolidated proceedings; and (2) proposed deadlines for experts and summary judgment briefing in that case. Dkt. 172 in Case No. 17-cv-2877.

At the outset, the parties note that fact discovery in the test cases, including *White Sr.*, 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 the *White Sr.* case below:

Task	Deadline
Plaintiff's expert disclosures	August 19, 2024
Defendants' depositions of Plaintiff's experts	September 20, 2024
Defendants' expert disclosures	October 21, 2024
Plaintiff's depositions of Defendants' experts	November 18, 2024
Summary judgment and <i>Daubert motions</i> (set by Dkt. 172)	December 20, 2024

Responses to summary judgment and Daubert motions	January 27, 2025
Replies in support of summary judgment and <i>Daubert</i> motions	February 17, 2025

The parties do not believe that there are any other matters that need to be brought to the Court's attention.

In accordance with the Case Management Order in the Watts Coordinated Proceedings, the parties are filing this status report under Docket Numbers 17-cv-2877 and 19-cv-1717. Dkt. 1 ("Unless otherwise ordered, when a party intends for a filing to apply only to one or certain of the consolidated actions, the filing party should file it under both Master Docket Case No. 19-cv-01717 and the individual case number(s) assigned to the particular case(s).").

Respectfully submitted,

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