

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

)	Master Docket Case No. 19-cv-1717
)	
In re: WATTS COORDINATED)	Judge Franklin U. Valderrama
PRETRIAL PROCEEDIONGS)	
)	Magistrate Judge Sheila M. Finnegan
)	
)	This Document Relates to All Cases

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE
ANSWERS TO COMPLAINTS IN THE COORDINATED PROCEEDINGS**

All Defendants in the Watts Coordinated Pretrial Proceedings, through their undersigned counsel, for their unopposed motion, respectfully request an additional extension of time to file answers to complaints in the cases coordinated under Master Docket Case No. 19 C 1717, and in support, state:

1. Defendants' answers to Plaintiffs' complaints in the cases coordinated under Master Docket No. 19 C 1717 are due May 30, 2024. Dkt. #700. There are over 170 individual cases that are part of the coordinated proceedings in which answers are required.

2. Defendants have been filing their answers on a rolling basis and will continue to do so. However, due to the time-consuming nature of preparing answers on behalf of multiple defendants and the volume of cases that comprise these coordinated proceedings, Defendants jointly request that the due date to complete their answers in all cases be extended to August 30, 2024.

3. Moreover, the parties have identified 19 “test cases” that are being litigated on a separate discovery track. Dkt. 393, Jan. 20, 2023, Status Report; Dkt. 395, January 23, 2023, Minute Order. Although the parties’ discovery efforts are focused on preparing the “test cases” for trial, Defendants will continue to file answers to the non-test cases on a rolling basis.

4. In addition, *Alvin Waddy v. City of Chicago, et al.*, 2019 L 10035, is set for trial on July 15, 2024, in Cook County Circuit Court. The *Waddy* case involves many of the same parties and counsel working on cases in these Coordinated Proceedings. Preparation for trial in *Waddy* has and will continue to require significant amounts of time of defense counsel.

5. Furthermore, the parties are currently conducting expert discovery in *Baker v. City of Chicago, et al.*, 16-cv-8940. This case is set for trial on January 8, 2025.¹

6. Counsel for the Defendant Officers has conferred with counsel for the Plaintiffs, and there is no opposition to the extension requested by Defendants.

7. This request for an extension of time is not made to unduly delay these proceedings. No prejudice will result to any party by extending the time to file the answers in light of the court's stay of discovery in non-test case, which the parties agreed to.

WHEREFORE, Defendants request that this Court enter an order extending the due date for their answers to the complaints in the Watts Coordinated Proceedings to August 30, 2024.

Dated: May 30, 2024

Respectfully submitted,

By: /s/ Paul A. Michalik
Special Assistant Corporation Counsel
One of the Attorneys for Defendants City of
Chicago and the Supervisory Officials

By: /s/ Anthony E. Zecchin
Special Assistant Corporation Counsel
One of the Attorneys for All Defendant
Officers except for Cadman, Spaargaren,
Mohammed, and Watts

¹ Four other Test Cases have also been set for trial in 2025. *Leonard Gipson v. City of Chicago, et al.*, 18-cv-5120, is set for trial on April 21, 2025; *William Carter v. City of Chicago, et al.*, 17-cv-7241, is set for trial on May 27, 2025; and *Lionel White, Sr. v. City of Chicago, et al.*, 17-cv-2877 is set for trial on July 7, 2025.

Terrence M. Burns
Daniel J. Burns
Paul A. Michalik
Daniel M. Noland
Katherine C. Morrison
Elizabeth A. Ekl
Dhaviella R. Harris
Reiter Burns, LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606 (312) 982-0090

By: /s/ Eric S. Palles
Special Assistant Corporation Counsel
One of the Attorneys for Defendant Kallatt
Mohammed
Eric S. Palles
Sean M. Sullivan
Yelyzaveta Altukhova
Ray Groble
Mohan Groble Scolaro, PC
55 W Monroe, Suite 1600
Chicago, IL 60603
Phone: (312) 422-9999

By: /s/ Thomas M. Leinenweber
Special Assistant Corporation Counsel
One of the Attorneys for Defendants
Michael Spaargaren and Matthew Cadman

Thomas More Leinenweber
James Vincent Daffada
Michael J. Schalka
Kevin E. Zibolski
John Robert Stortz
Leinenweber Daffada & Sansonetti, LLC
120 N. LaSalle St., Suite 2000
Chicago, IL 60602
(312) 606-8695

Andrew M. Hale
Anthony E. Zecchin
Kelly M. Olivier
William E. Bazarek
Jason M. Marx
Hannah Beswick-Hale
Hale & Monico LLC
53 W. Jackson Blvd., Suite 334
Chicago, IL 60604
(312) 341-9646

By: /s/ Brian P. Gainer
Special Assistant Corporation Counsel
One of the Attorneys for Defendant Ronald
Watts
Brian P. Gainer
Monica Burkoth
Lisa M. McElroy
Alezza Mian
Johnson & Bell, Ltd.
33 W. Monroe St., Suite 2700
Chicago, IL 60603
(312) 372-0770

By: /s/ Timothy P. Scahill
Special Assistant Corporation Counsel
One of the Attorneys for Defendant Calvin
Ridgell

Timothy P. Scahill
Steven B. Borkan
BORKAN & SCAHILL, LTD.
Two First National Plaza Timothy P. Scahill
20 South Clark Street, Suite 1700
Chicago, Illinois 60603
(312) 580-1030