

**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-1717  
 )  
 ) Judge Franklin U. Valderrama  
 )  
 ) 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.<sup>1</sup>

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

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

Respectfully submitted,

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