

**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 ALL CASES

## **JOINT STATUS REPORT**

All parties to the coordinated proceedings respectfully submit the following joint status pursuant to the Court's order of May 8, 2024. Dkt. 728.

1. **Depositions.** Since the parties filed their last status report, they have taken four depositions in the Coordinated Proceedings. The remaining individuals expected to be deposed pursuant to the Court’s January 13, 2024, order are listed on an updated chart that is being filed as Exhibit 1 to this status report. The chart also lists the expected dates of the depositions that have been scheduled, and it notes those depositions that have been attempted to date. The parties continued to work on scheduling depositions other than those where the scope of the deposition is subject to a pending motion.

2. **Dispute regarding two potential witnesses.** The Individual Defendants and Plaintiffs also completed the meet and confer process and are at impasse with respect to the deposition of two potential witnesses: Gerard Baker and Bryant Patrick. The next paragraph provides an overview of the dispute with respect to these witnesses. The parties do not believe that the briefing is necessary to resolve this dispute and instead request that the Court hear argument on the dispute at the next status conference. The parties are prepared to file motions or provide

additional information in writing if the Court instead prefers that approach.

3. In short, Plaintiffs previously listed Gerard Baker as a damages witness in the *Baker/Glenn* case, but they withdrew him as a witness before the December 2023 discovery cutoff. Plaintiffs therefore do not believe that he should be deposed. Defendants believe that Gerard Baker has relevant information about Mr. Baker's claimed damages and information about his role and observations in Mr. Baker's narcotics activity following his release from prison in 2016. In addition, Plaintiff's two other sons have already been deposed. The dispute with respect to Mr. Patrick is different. He is a Plaintiff but not in a test case. Plaintiffs agree that he will eventually be deposed once the stay is lifted in the non-test cases. The Individual Defendants are requesting to depose Mr. Patrick as a witness in the *Baker/Glenn* case based on Mr. Baker's testimony that Mr. Patrick sold drugs for him at Ida B. Wells. It is Defendants' position that Mr. Patrick is a witness and participant to Mr. Baker's illegal narcotics activity at Ida B. Wells. Mr. Patrick was previously included on Exhibit 1 based on a mistaken understanding by Plaintiffs as to why the Individual Defendants were requesting Mr. Patrick's deposition. Specifically, Plaintiffs were under the assumption that the Individual Defendants believed that Mr. Patrick was a fact witness for one or more of Plaintiff Baker's arrests that are at issue in this case.

4. **Expert disclosures.** Subject to the motions referenced in paragraph 5, both sides have completed their expert disclosures in the *Baker/Glenn* case. Plaintiffs are in the process of deposing Defendants' experts.

5. **Motions and briefs filed.** Finally, the parties filed numerous briefs and motions since the last status conference. Specifically, Plaintiffs filed their response to Defendants' motion to conduct a Rule 35 examination of Clarissa Glenn, as well their response to Defendants' motion to conduct forensic testing in the *Baker/Glenn* case. Defendants filed their reply brief in support

of the motion to conduct forensic testing, reply brief in support of their motion to conduct a Rule 35 examination of Glenn, and they filed a supplement relating to the Cook County State's Attorney's motion to quash deposition subpoenas.

6. The Defendants have completed their review of the disks/consensual recordings that have been made available to date at the FBI Chicago Field Office and have requested the production of all disks/consensual recordings. Defendants are awaiting the FBI's response to this request.

Respectfully submitted,

/s/ Scott Rauscher

One of the Attorneys for the Plaintiffs Represented by Loevy & Loevy in the Coordinated Proceedings

Arthur Loevy  
Jon Loevy  
Scott Rauscher  
Josh Tepfer  
Theresa Kleinhaus  
Sean Starr  
Wallace Hilke  
Gianna Gizzi  
LOEVY & LOEVY  
311 N. Aberdeen St., Third Floor  
Chicago, IL 60607

/s/ Joel A. Flaxman

One of the Attorneys for Plaintiffs Represented by Kenneth N. Flaxman, P.C. in the Coordinated Proceedings

Joel A. Flaxman  
Kenneth N. Flaxman  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
(312) 427-3200

/s/ Kelly M. Olivier

Special Assistant Corporation Counsel  
One of the Attorneys for Defendants Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nichols, Jr., Manuel S. Leano, Brian Bolton, Kenneth Young, Jr., David Soltis, Elsworth J.

Smith, Jr., Gerome Summers, Jr., John Rodriguez, Lamonica Lewis, Frankie Lane, Katherine Moses-Hughes, Darryl Edwards, and Nobel Williams

Andrew M. Hale  
William E. Bazarek  
Anthony E. Zecchin  
Jason Marx  
Kelly Olivier  
HALE & MONICO LLC  
Special Assistant Corporation Counsel  
53 W. Jackson Blvd., Suite 330  
Chicago, IL 60604  
(312) 341-9646

/s/ Eric S. Palles  
One of the Attorneys for Defendant Kallatt Mohammed

Eric S. Palles  
Sean M. Sullivan  
Raymond H. Groble III  
MOHAN GROBLE SCOLARO, PC  
Special Assistant Corporation Counsel  
55 W. Monroe Street, Suite 1600  
Chicago, Illinois 60603  
(312) 422-9999

/s/ Brian Gainer  
One of the Attorneys for Defendant Ronald Watts

Brian P. Gainer  
Monica Burkoth  
JOHNSON & BELL, LTD.  
Special Assistant Corporation Counsel  
33 West Monroe Street, Suite 2700  
Chicago, Illinois 60603  
(312) 372-0770

/s/ Paul A. Michalik  
One of the Attorneys for Defendants  
City of Chicago, Philip Cline, Debra Kirby, Karen Rowan, Jerrold Bosak, Dana Starks, and  
Terry Hillard

Terrence M. Burns  
Paul A. Michalik  
Daniel M. Noland  
Elizabeth A. Ekl

Katherine C. Morrison  
BURNS NOLAND LLP  
Special Assistant Corporation Counsel  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
(312) 982-0090

/s/ Thomas M. Leinenweber

One of the Attorneys for Defendants Michael Spaargaren and Matthew Cadman

Thomas M. Leinenweber  
James V. Daffada  
Michael J. Schalka  
Special Assistant Corporation Counsel  
LEINENWEBER BARONI & DAFFADA LLC  
120 North LaSalle Street, Suite 2000  
Chicago, Illinois 60602  
(312) 606-8695

/s/ Timothy P. Scahill

One of the Attorneys for Defendant Calvin Ridgell, Jr.  
Steven B. Borkan  
Timothy P. Scahill  
Borkan & Scahill, Ltd.  
20 S. Clark St., Suite 1700  
Chicago, IL 60302  
(312) 580-1030  
Fax: (312) 263-0128