

**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 Valderrama
)	Magistrate Judge Finnegan
)	

THIS DOCUMENT RELATES TO
In re: Watts Coordinated Pretrial Proceedings, Case No. 19-CV-01717

Agreed Motion to Modify Order and Set Status Hearing

NOW COME the Defendants, by and through their attorneys, hereby move this Honorable Court for an order to vacate the briefing schedule for Defendant Officers' Motion to Compel the production of FBI consensual recordings (Dkt. 788) and set a status hearing in 30 days.

1. Following last week's status hearing with the Court, and taking the Court's comments regarding a motion to compel into consideration, counsel for the Defendants have had discussions with counsel for the Government, AUSA Donald Lorenzen, regarding a renewed and more narrowly tailored request for production of the consensual recordings.

2. However, due to commitments related to the Democratic National Convention taking place in Chicago next week, and commitments in the weeks following, the Defendants and the Government need more time to continue their discussions regarding the production of the consensual recordings.

3. Defendants with the agreement of the Government request that the briefing schedule for Defendants' Motion to Compel (Dkt. 788) be vacated, and this matter be set for status hearing in 30 days.

4. In the interim, Defendants and the Government will continue in their discussions in an effort to resolve the issue without motion practice.

5. No prejudice will be suffered by any party as a result of this motion, and the Defendants and the Government are in agreement with this request.

WHEREFORE, Defendants request an order vacating the briefing schedule for the Motion to Compel and setting a status hearing in 30 days.

Date: August 16, 2024

Respectfully submitted,

/s/ Terrence M. Burns
Special Assistant Corporation Counsel
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
Dhaviella N. Harris
BURNS NOLAND LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090

s/ Kelly 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
53 W. Jackson Blvd., Suite 330

Chicago, IL 60604
(312) 341-9646