

**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

Joint Status Report

Undersigned Defendants respectfully submit the following joint status report regarding Defendants' requests for production of certain Federal Bureau of Investigations ("FBI") consensual recordings in advance of the October 2, 2024 deadline on which Defendants were given leave to file their motion to compel (Dkt. 810):

1. Defendants submitted requests for production of 25 consensual recordings to Assistant United States Attorney (“AUSA”) Donald Lorenzen, following last week’s status hearing in which the Court granted Defendants’ oral motion to extend the deadline by which they must file a motion to compel.

2. Defendants' counsel have spoken to AUSA Lorenzen regarding the Defendants' requests for certain consensual recordings and AUSA Lorenzen indicated that the Government will require additional time to review the requests and the 25 recordings at issue.

3. Accordingly, to allow the Government additional time to respond to Defendants' requests for 25 consensual recordings, Defendants ask the Court to vacate the October 2, 2024 deadline for Defendants' filing of their motion to compel.

4. Based on their discussions with AUSA Lorenzen, Defendants suggest providing a status report to the Court by October 16, 2024, to report the Government's position and advise the Court whether the issue can be resolved without motion practice.

5. If necessary, Defendants will file their motion to compel by or on October 29, 2024.

6. Undersigned counsel has spoken with Plaintiff's counsel, who has no objection with this request.

7. Defendants and the Government are in agreement with this request and no prejudice will be suffered by any party as a result.

Date: October 1, 2024

Respectfully submitted,

/s/ Dhaviella Harris

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