

## EXHIBIT 1 - DEPOSITION CHART

Relation	Last Name	First Name	Deposition Date
<i>Ali Chauncey, 20 C 2914</i>			
<i>Witnesses are deposed</i>			
<i>Ben Baker &amp; Clarissa Glenn, 16 C 8940</i>			
ASA in Judge Toomin's courtroom (Ben Baker)	Nazarian	Nancy	11/6/2024
<i>Bobby Coleman, 19 C 1094</i>			
Damages witness	Thompson	Siobahn	Defendants have requested a date for Ms. Thompson's deposition.
<i>Milton Delaney, 19 C 1083</i>			
<i>Witnesses are deposed</i>			
<i>Marc Giles, 21 C 4798</i>			
<i>Witnesses are deposed</i>			
<i>Phillip Thomas, 18 C 5132</i>			
<i>Witnesses are deposed</i>			
<i>Leonard Gipson, 18 C 5120</i>			
<i>Witnesses are deposed</i>			
<i>Stefon Harrison, 20 C 2918</i>			
<i>Witnesses are deposed</i>			
<i>Tyrone Herron, 21 C 4813</i>			
<i>Witnesses are deposed</i>			
<i>Allen Jackson, 18 C 5121</i>			
Knowledge of arrest/knowledge of Watts team	Bennett	Roy "Shock"	No subpoena has been issued; defense is still attempting to locate
Testified at criminal trial as witness	Booker	Shamika	Parties conferring
Sister/damages	Woods	Latanya	Plaintiff attempting to locate.
<i>Jesse Lockett, 19 C 7232</i>			
Witness	Jones	Rudy	Defense is attempting to locate
Witness	Willis	Kenneth	Defense is attempting to locate
<i>Larry Lomax, 19 C 1095</i>			
<i>Witnesses are deposed</i>			
<i>Octavia McDonald, 19 C 1101</i>			
<i>Witnesses are deposed</i>			

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<b><i>Andre McNairy, 18 C 5127</i></b>			
Nephew	Patterson	Reginald	Defense attempted to secure deposition but was unable to do so. Plaintiff's counsel continues trying to arrange appearance.
<b><i>George Ollie, 19 C 0131</i></b>			
<i>Witnesses are deposed</i>			
<b><i>Clifford Roberts, 22 C 674</i></b>			
<i>Witnesses are deposed</i>			
<b><i>Henry Thomas, 18 C 5131</i></b>			
Brother/damages/knowledge of arrest	Thomas	Anthony	8/29/2024 – Started but suspended. Parties conferring on new date.
Former girlfriend/damages/knowledge of arrest	Owens	Linda	10/10/2024
<b><i>William Carter, 17 C 7241</i></b>			
Non-party witness w/ info on Carter's arrest 6/18/2004	Tate	Roy	10/22/2024
Non-party witness w/ info on Carter's arrest 5/19/2006	Cline	Valencia	Dates requested, Plaintiff working on reaching witness
Non-party witness w/ info on PL Carter's arrest 5/19/2006/testified @ Carter's criminal trial	Coleman	Deana	Defendants have requested deposition dates and are waiting to hear from Plaintiff's counsel
<b><i>Lionel White Sr., 17 C 2877</i></b>			
Chicago Police Department (Officer)	Echeverria	Daniel	8/12/2024; Deposition commenced and continued and may be the subject of motion practice.
<b><i>In re Watts Coordinated Proceedings, 19 C 1717</i></b>			
FBI agent	Henderson	Craig	The parties are conferring with the FBI regarding scheduling the depositions of agents Hart, Henderson and Ponicki, and hope to have confirmed these dates by the end of this week.
FBI agent	Hart	Raymond	The parties are conferring with the FBI regarding scheduling the depositions of agents Hart, Henderson and Ponicki, and hope to have confirmed these dates by the end of this week.

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Former FBI agent	Smith	Patrick	Apparently, former FBI agent Smith has retained private counsel and the parties will work with Smith's counsel to arrange his deposition.
Baker & Glenn's lawsuit/knowledge of Watts team	Henderson	Michael	4/19/2024, cancelled, H&M unable to effectuate service, H&M is continuing to attempt to locate, but has been unable to do so.
Knowledge of Watts team	Hopkins	Daniel	Parties continue to work on securing deposition from this witness.
Knowledge of Watts team	Graham	Stacy	10/25/2024
Plaintiff/404b witness	Crawford	William	11/15/2024
Plaintiff/404b witness	Fears	Jerome	Parties conferring on a date.
Plaintiff/knowledge of Watts team	Patrick	Bryant	Mr. Patrick is no longer incarcerated, and the parties are conferring on a deposition date.
<b><i>Additional Depositions</i></b>			
Former Assistant State Attorney	Adduci	Nancy	Defendants are waiting to hear back from Ms. Adduci's conflicts counsel.
Former Assistant State Attorney	Sussman	Eric	10/17/2024
Sin City narcotics sale at 574 to UCO Williams	Seay	Harold	4/30/2024, cancelled, H&M unable to effectuate service, H&M is continuing to attempt to locate.
FBI agent	Ponicki	Mike	The parties are conferring with the FBI regarding scheduling the depositions of agents Hart, Henderson and Ponicki, and hope to have confirmed these dates by the end of this week.
Former Assistant State's Attorney	Magats	Joseph	Defendants are conferring with the SAO on a date for this deposition.
Former Assistant State's Attorney	Rotert	Mark	10/28/2024