

**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 REGARDING TEST-CASE DEPOSITIONS**

All parties to the coordinated proceedings respectfully submit the following joint status report regarding depositions in the test cases pursuant to the Court's order of October 15, 2024.

1. The parties have completed the depositions of former Assistant State's Attorneys Magats, Rotert, and Sussman. The deposition of ASA Nancy Adduci began on October 21, 2024 and has yet to be completed. Given the pending settlement in the Baker/Glenn case, they did not complete the deposition of ASA Nazarian, who would have testified about her role in the Baker/Glenn criminal proceedings.

2. As noted in the attached chart, the parties agreed to postpone the depositions of the FBI agents to a date closer in time to the *Gipson* trial because the deposition testimony of some or all of those agents is likely to be their trial testimony. The parties have agreed with the federal government that even if the agents are deposed after the Coordinated Proceedings end, the agents will still only be deposed once in the Watts cases (absent a court order allowing for additional time, for example if there is a dispute about the proper scope of question that results in motion practice).

3. The parties continue to work on finishing the small number of remaining third-party depositions reflected on the attached deposition chart.

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