

**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. Dkt. 823.

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