

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Germin Sims and Robert Lindsey,)
)
)
 Plaintiff) 19-cv-2347
)
)
 -vs-) (*Chief Judge Pallmeyer*)
)
City of Chicago, et al.,)
)
)
 Defendants)

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of September 5, 2023:

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 150 cases that are coordinated for pretrial proceedings. ECF No. 20. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

On January 20, 2023, the parties submitted a joint status report in the coordinated proceedings, indicating that the parties have agreed on a list of 19 proposed “test cases.” ECF No. 393 in Case No. 19-cv-1717. The parties will focus on litigating the 19 “test cases” to their conclusion to help the parties assess the value and merit of the remaining cases. This case is not one of the test cases.

On February 13, 2023, Magistrate Judge Finnegan set a fact discovery deadline in the test cases of December 18, 2023. ECF No. 419 in Case No. 19-cv-1717. On January 13, 2024, Magistrate Judge Finnegan entered an order allowing some discovery to be taken after the deadline.

On April 13, 2023, Magistrate Judge Finnegan stayed discovery in non-test cases, including this one, for at least six months, when the issue will be revisited. ECF No. 491 in Case No. 19-cv-1717. Magistrate Judge Finnegan recently requested that the parties confer about a plan for discovery in the non-test cases.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
attorneys for plaintiff

/s/ Paul A. Michalik (by consent)
Daniel M. Noland
Terrence M. Burns
Paul A. Michalik
Katherine C. Morrison
Daniel J. Burns
Dhaviella N. Harris
Reiter Burns LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090

attorneys for defendants City of Chicago, Philip Cline, and Debra Kirby

/s/ Brian P. Gainer (by consent)
Brian P. Gainer
Monica Burkoth
Lisa M. McElroy
Johnson & Bell, Ltd.
33 West Monroe St., Ste 2700
Chicago, IL 60603
(312) 372-0770
attorneys for defendant Ronald Watts

/s/ Eric S. Palles (by consent)
Eric S. Palles
Sean M. Sullivan
Mohan Groble Scolaro, PC
55 West Monroe St., Ste 1600
Chicago, IL 60603
(312) 422-9999
attorneys for defendant Mohammed

/s/ William E. Bazarek (by consent)
Special Assistant Corporation
Counsel
William E. Bazarek
Andrew M. Hale
Anthony E. Zecchin
Jason M. Marx
Kelly M. Olivier
Hale & Monico LLC
53 West Jackson Blvd., Ste 334
Chicago, IL 60604
(312) 341-9646
attorneys for remaining defendants