

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

Jamar Lewis,	)	
	)	No. 19-cv-7552
<i>Plaintiff</i>	)	
	)	( <i>Judge Chang</i> )
-vs-	)	
	)	( <i>Magistrate Judge McNally</i> )
Ronald Watts, et al.,	)	
	)	
<i>Defendants</i>	)	
	)	
Willie Roberson Jr.,	)	
	)	No. 22-cv-6050
<i>Plaintiff</i>	)	
	)	( <i>Judge Chang</i> )
-vs-	)	
	)	( <i>Magistrate Judge McNally</i> )
City of Chicago, et al.,	)	
	)	
<i>Defendants</i>	)	

**JOINT STATUS REPORT**

The parties, by counsel, submit this joint status report pursuant to the Court's Order of March 6, 2025:

**Discovery:** In *Roberson* the parties are completing written discovery, and they will schedule depositions before the close of fact discovery. In *Lewis*, the parties have completed written discovery and some depositions, and they will schedule additional depositions before the close of fact discovery.

**Settlement:** The parties are communicating about settlement of various cases that were previously part of the Watts Coordinated Proceedings with the

assistance of Magistrate Judge Valdez. The next conference with Magistrate Judge Valdez is scheduled for June 24, 2025.

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  
Burns Noland LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
(312) 982-0090  
*attorneys for defendants City of Chicago, Cline, and 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  
Lisa Altukhova

Mohan Groble Scolaro, PC  
55 West Monroe St., Ste 1600  
Chicago, IL 60603  
(312) 422-9999  
*attorneys for defendant Mohammed*

/s/ Timothy P. Scahill (by consent)  
Timothy P. Scahill  
Steven B. Borkan  
BORKAN & SCAHILL, LTD.  
Two First National Plaza  
20 South Clark Street, Suite 1700  
Chicago, Illinois 60603  
(312) 580-1030  
*attorneys for defendant Ridgell*

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