

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

Gregory Dobbins, <i>Plaintiff</i>)	
v.)	Case No.: 19-cv-3322
City of Chicago et al. <i>Defendants</i>)	Honorable Judge Chang
)	
Octayvia McDonald <i>Plaintiff</i>)	Case No.: 19-cv-1101
v.)	Honorable Judge Chang
City of Chicago et al. <i>Defendants</i>)	
)	
LeRoy Williams <i>Plaintiff</i>)	Case No.: 22-cv-5688
v.)	Honorable Judge Chang
City of Chicago et al. <i>Defendants</i>)	
)	
Joseph Wright <i>Plaintiff</i>)	Case No.: 22-cv-5994
v.)	Honorable Judge Chang
City of Chicago et al. <i>Defendants</i>)	
)	
Jamar Lewis <i>Plaintiff</i>)	Case No.: 19-cv-7552
v.)	Honorable Judge Chang
Ronald Watts, et al. <i>Defendants</i>)	
)	
Willie Roberson Jr. <i>Plaintiff</i>)	Case No.: 22-cv-5994
v.)	Honorable Judge Chang
City of Chicago et al. <i>Defendants</i>)	

JOINT STATUS REPORT

Plaintiffs and Defendants jointly submit this status report indicating how they intend to proceed with the individual cases in light of the trial scheduled in *Gipson v. City of Chicago, et al.*, 18-cv-5120, pursuant to the court November 13, 2024, Order:

1. As described previously, the parties in the Coordinated Proceedings proposed that instead of continuing to litigate all the cases in the Coordinated Proceedings simultaneously, they instead concentrate on test cases along the lines of those used in MDL proceedings. *See* Dkt. 363 in Case No. 19-cv-1717. The parties jointly proposed 19 cases to serve as the test cases, and this case was one of those test cases. *See* Dkt. 393 in Case No. 19-cv-1717.

2. Fact discovery, for the 19 test cases, closed over a year ago on December 18, 2023, with limited exceptions for certain depositions that were allowed to proceed after the close of fact discovery. *See* Dkt. 419 in Case No. 19-cv-1717. This includes *Monell* discovery, which applies to all of the cases in the Coordinated Proceedings. These outstanding depositions include the completion of Daniel Echeverria's deposition and a handful of depositions of FBI agents, which the parties expect to complete in February and March. None of these depositions relate specifically to these cases, but are instead expected to cover more general topics relevant for all *Watts* cases.

3. The parties intend to proceed forward with discovery in individual cases while *Gipson* is set for trial.

4. **Test Case.** *McDonald*, Case No. 19-cv-1101, was a test case and therefore has no outstanding fact discovery other than that noted above. The parties anticipate that expert discovery in *McDonald* will be comparable to the expert discovery that the parties have completed in other test cases, and likely will include most or all of the same experts who have

already been disclosed. Plaintiff proposes the following expert schedule:

Event	Date
Plaintiff's Expert Disclosures Due	June 30, 2025
Defendants' Expert Disclosures Due	July 28, 2025

5. **Non-Test Cases.** For *Dobbins*, *Williams*, *Wright*, *Lewis*, and *Roberson*, based on the discovery conducted in the test cases, the parties anticipate that the remaining fact discovery will be limited to a small number of depositions, which will primarily consist of completing the party depositions in each case. Plaintiffs also note that they may be able to forego deposing any Defendants who have not been deposed in each case if, as in many other *Watts* cases, Defendants will be testifying that they do not remember Plaintiffs or the arrest at issue. Additional depositions may include any occurrence and damages witnesses disclosed by the parties.

6. Plaintiff proposed the following discovery schedule for *Dobbins*, *Williams*, *Wright*, *Lewis*, and *Roberson*.

Event	Date
Rule 26(a) Disclosures Due	March 3, 2025
Fact Discovery Deadline	June 30, 2025
Plaintiff's Expert Disclosures Due	June 30, 2025
Defendants' Expert Disclosures Due	July 28, 2025

7. Defendants note that, although fact discovery may not be extensive in each individual case, there are a significant number of other non-test cases that have been released from the Coordinated Proceedings at the same time (all of which are cases like these in which a

discovery stay has been lifted). With this in mind, Defendants propose the following discovery schedule for *Dobbins, Williams, Wright, Lewis, and Roberson*.

Event	Date
Rule 26(a) Disclosures Due	March 3, 2025
Fact Discovery Deadline	September 27, 2025
Plaintiff's Expert Disclosures Due	September 27, 2025
Defendants' Expert Disclosures Due	October 27, 2025
Experts Deposed By	November 24, 2025

8. Finally, although there are no active settlement discussions with respect to these specific cases, counsel for plaintiffs in the Coordinated Proceedings and counsel for the City were discussing settlement issues with Magistrate Judge Finnegan. Both sides are interested in pursuing talks to determine whether settlement is possible. To that end, the parties are currently engaged in settlement discussions with Magistrate Judge Valdez regarding six cases, including the *Gipson v. City of Chicago* case, with the next conference scheduled for February 18, 2025. The parties intend to continue settlement discussions in the cases previously part of the coordinated proceedings, which would include these cases..

Respectfully submitted,

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