

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

Derrick Schaeffer,)	
)	
<i>Plaintiff,</i>)	No. 19-cv-7711
)	
-vs-)	(Judge Dow)
)	
City of Chicago, et al.)	(Magistrate Judge Gilbert)
)	
<i>Defendants.</i>)	

**PLAINTIFF’S PROPOSED PROTOCOL FOR RECORDING
DEPOSITIONS TAKEN ON THE ZOOM PLATFORM**

Pursuant to the Court’s Order of January 12, 2021, plaintiff submits the following proposed protocol for recording depositions to be taken on the Zoom platform. Defendants do not agree to this protocol and will submit a separate filing stating their position.

1. When a deposition is to be conducted on the Zoom platform before a stenographic court reporter qualified to administer the oath and to certify the written transcript of the deposition, any party may record the deposition through the Zoom application without an independent videographer pursuant to this protocol.

2. The party recording the deposition through the Zoom application without an independent videographer must provide advance written notice stating that a video recording of the deposition will be made through the Zoom application without an independent videographer in compliance with this “Protocol for Recording Depositions Taken on the Zoom Platform.”

3. An oral notice that a video recording of the deposition will be made through the Zoom application without an independent videographer must be given on the record at the deposition before questioning begins.

4. The recording must be made using the “Spotlight View” function in Zoom, which (as tested by plaintiff’s counsel on January 12, 2021) will result in recording of only the deponent’s video camera.

5. Recording will be paused when the parties to the deposition speak off the record. An oral announcement will be made any time the Zoom recording is paused or re-started.

6. After the deposition is complete, the party who made the recording must provide access to the recording on a password protected website to all parties at no charge.

7. In any recording made under this protocol, the deponent’s appearance or demeanor must not be distorted through recording techniques.

8. Admissibility of any portion of a video recording made under this protocol will be determined by the trial court.

Respectfully submitted,

/s/ Joel A. Flaxman
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