

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>	)	

**RESPONSE TO DEFENDANTS' "EXPLANATION IN  
SUPPORT OF THEIR PROTOCOL FOR RECORDING  
DEPOSITIONS ON THE ZOOM PLATFORM"**

The parties, after having conferred about the form of order requested by the Court following the hearing of January 12, 2021, have submitted dueling versions of a "Zoom Protocol."

Defendants' submission (ECF No. 110) seeks to re-argue the issues resolved by the Court at the hearing on January 12, 2021. Defendants' primary complaint appears to be that the Court erred in rejecting the defense argument that an independent videographer whenever a party is supplementing stenographic recording with video, as authorized by Rule 30(b)(3)(B). The Court considered and correctly rejected this argument and should not revisit its ruling.

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