

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

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

JOINT UPDATED STATUS REPORT ON DISCOVERY

Pursuant to the Court's Order of January 4, 2021, the parties submit the following status report on discovery:

Depositions in this matter were postponed while the Magistrate Judge resolved defendants' motion for a protective order. The Court resolved that motion on January 25, 2021. The parties will undertake the depositions of defendant Kinsey and Gregoire on or before February 26, 2021.

The parties will also continue their efforts to schedule the depositions of four non-party witnesses: Janice Branscomb, Nathaniel Branscomb, Cheryl Young, and Harold Fields. The parties also plan to depose Assistant State's Attorneys involved with plaintiff's criminal prosecution. The parties expect to complete these depositions by the end of March.

Plaintiff served supplemental written discovery requests, which defendants will answer by February 9, 2021. The supplemental discovery requests concern the identity of a Chicago police officer who signed the criminal

complaint against plaintiff and the alleged facts surrounding the destruction of video recorded in the police vehicle driven by defendants Perez, Brandon, and Kinsey when they arrested plaintiff, if any. Plaintiff expects to notice a Rule 30(b)(6) deposition on these topics after receiving responses to the written discovery.

The parties agree that they will not be able to complete discovery before the current deadline of February 26, 2021 and respectfully request that the Court extend the deadline by two months.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
Attorneys for Plaintiff

/s/ Evan K. Scott (with consent)
Evan K. Scott
Jessica Ziswa
Gregory M. Beck
City of Chicago Department of Law
30 North LaSalle Street, Suite 900
Chicago, Illinois 60602
(312) 744-3982
Attorneys for Individual Defendants

CELIA MEZA
Acting Corporation Counsel for the City of Chicago

By: /s/ Raoul Vertick Mowatt (with consent)
Raoul Vertick Mowatt

Iris Y. Chavira
Stephanie A. Sotomayor
City of Chicago Department of Law
30 North LaSalle Street, Suite 900
Chicago, Illinois 60602
(312) 744-3283
Attorneys for the City of Chicago