

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

## JOINT STATUS REPORT CONCERNING DEPOSITIONS

Pursuant to the Court's Order of February 11, 2021, the parties file this status report concerning depositions:

1. The parties completed the depositions of defendant Kinsey and defendant Gregoire-Watkins.
2. The deposition of Officer Radulescu is scheduled for March 8, 2021.
3. Several non-party witnesses remain to be deposed: Assistant State's Attorneys Lisa Mateck and Nahed Zayyed, as well as on-scene witnesses Janice Branscomb, Cheryl Young, and Harold Fields. The parties will continue their efforts to schedule the depositions of these witnesses before the fact discovery deadline of March 31, 2021, but the parties may need to reinstate their request for an extension of this deadline.
4. Plaintiff anticipated taking a Rule 30(b)(6) deposition about defendant City of Chicago's policies for retaining in-car camera video. This deposition is related to the *Monell* claim included in plaintiff's amended complaint, ECF No. 93, which defendant has moved to dismiss, ECF No. 103.

5. On February 9, 2021, defendant City of Chicago provided notice that it intends to produce a document that could cause plaintiff to abandon his *Monell* claim. Thereafter, Judge Dow granted plaintiff's motion to stay briefing on the motion to dismiss and ordered the parties to file a status report on or before March 15, 2021. ECF No. 119. Defendant has not yet produced the document.

Respectfully submitted,

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