

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

JOINT STATUS REPORT

Pursuant to the Court's Order of May 19, 2020, the parties submit the following Joint Status Report:

Progress of Discovery: The parties have produced documents in compliance with the Mandatory Initial Disclosure Project. The Cook County State's Attorney has produced documents in response to plaintiff's Subpoena. The parties have exchanged written discovery requests and will confer about the possibility of holding some depositions by videoconference.

Fact discovery cutoff: The parties agree that they will not be able to complete fact discovery by August 7, 2020, but they do not agree on how to set a new fact discovery cut-off date.

Plaintiff proposes that the Court hold a status hearing in August to discuss setting an appropriate date for the close of discovery. Defendants propose a fact discovery closure date of February 3, 2021.

Settlement prospects: Plaintiff served defendants with a settlement proposal on June 2, 2020. Defendants are unable to state when they will be able to respond to plaintiff's proposal. After defendants respond, the parties will confer about whether a settlement conference is appropriate.

Respectfully submitted,

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