

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

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

JOINT STATUS REPORT

Pursuant to Judge Dow's Order of June 19, 2020 and Magistrate Judge Gilbert's Order of August 12, 2020, the parties submit the following Joint Status Report:

Progress of discovery: Plaintiff has responded to defendants' written discovery requests. Defendants produced some documents in response to plaintiff's written discovery requests on July 29, 2020. The parties have agreed that defendants will complete their response to plaintiff's written discovery requests by August 29, 2020. Defendants estimate that amid the pandemic it will take until late October for document production to be complete.

Proposed date for the close of fact discovery: The parties jointly propose a fact discovery close date of February 26, 2021.

Discovery disputes: The parties have a dispute about defendants' position that they will not produce transcripts in their possession from the criminal case against plaintiff. The parties agree that further attempts to resolve this dispute in accordance with Local Rule 37.2 will be futile. The parties propose the following briefing schedule: plaintiff's motion to compel due on 8/21/20, defendants' response due on 9/4/20, plaintiff's reply due on 9/11/20.

Depositions: At this time, the parties anticipate taking depositions of about ten people: plaintiff, the four individual defendants, four witnesses with knowledge of the events leading to plaintiff's arrest (Harold Field, Cheryl Young, Janice Branscomb, and Nathaniel Branscomb), and one or more prosecutors with knowledge of plaintiff's charging and prosecution (Assistant State's Attorneys Lisa Mateck, Nicholas D'Angelo, Mikah Soliunas and Nahed Zayed.) The parties intend to take these depositions in October, November, and December.

Remote means: The parties agree to take depositions by remote means.

Settlement: Defendants are currently not in a position to respond to plaintiff's settlement proposal but anticipate they will do so by September 25, 2020. The parties will know whether there is a realistic possibility of

settlement at that time. Should the parties believe that a settlement conference might be fruitful, the parties will request one.

Respectfully submitted,

/s/ Joel A. Flaxman

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