

Exhibit 2

DECLARATION OF COUNSEL

I declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

1. My name is Joel Flaxman. I represent the plaintiff in *Schaeffer v. Chicago*, 19-cv-771.

2. On Wednesday, September 2, 2020 at about 3:30 p.m., I talked by phone with Assistant State's Attorney Dana Brisbon about the State's Attorney's revised privilege log.

3. Mr. Brisbon stated that he will be producing copies of pages 100-102, which are labeled in the privilege log as "Criminal Code."

4. I have not received copies of these pages.

5. Mr. Brisbon stated that the State's Attorney is not willing to reconsider any of its objections to producing other withheld pages.

6. Mr. Brisbon agreed that further attempts to resolve the parties' differences will be futile.

Dated: September 8, 2020

/s/ Joel A. Flaxman
Joel A. Flaxman