

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

Derrick Schaeffer,)	
)	
Plaintiff,)	No. 19-cv-7711
)	
-vs-)	Judge Robert M. Dow Jr.
)	
City of Chicago, et al.)	Magistrate Judge Jeffrey T. Gilbert
)	
Defendants.)	

AGREED MOTION FOR LEAVE TO RESCHEDULE DEPOSITIONS

Plaintiff, by and through his attorney, Joel Flaxman, and Defendants James Brandon, Mario Perez, Jocelyn Gregoire-Watkins, and James Kinsey (collectively, “Defendant Officers”), by and through their attorney, Evan K. Scott, Assistant Corporation Counsel for the City of Chicago, respectfully request that this Court grant the parties leave to reschedule the depositions of Plaintiff and Defendants Perez and Kinsey, with firm deposition dates for these parties to be included in a joint status report to be filed by November 13. In support of this motion, the parties state as follows:

1. On October 1, 2020, Plaintiff filed a Joint Status Report on Deposition Scheduling. *See* ECF Dkt. No. 63.
2. On October 2, 2020, Court ordered in part that “the parties shall take the depositions of Plaintiff and Defendants Perez and Kinsey on the dates specified in their [October 1, 2020] Report absent a court order allowing those depositions to be rescheduled.” ECF Dkt. No. 65.
3. Due to delays in the production of outstanding discovery, the parties need to reschedule the depositions of Plaintiff and Defendants Perez and Kinsey.

4. The parties respectfully request that the Court grant the parties leave to reschedule the depositions of Plaintiff and Defendants Perez and Kinsey, with firm deposition dates for these parties to be included in a joint status report to be filed by November 13, 2020.

5. No prejudice will be suffered by any party as a result of the requested extension.

WHEREFORE, the parties respectfully request that this Court grant the parties leave to reschedule the depositions of Plaintiff and Defendants Perez and Kinsey, with firm deposition dates for these parties to be included in a joint status report to be filed by November 13.

Dated: October 22, 2020

Respectfully submitted,

By: /s/ Joel Flaxman
Joel Flaxman

Joel Flaxman
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/s/ Evan K. Scott
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Counsel for Defendants Brandon, Perez, Gregoire-Watkins and Kinsey

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2020, I served a true and correct copy of the foregoing **AGREED MOTION FOR LEAVE TO RESCHEDULE DEPOSITIONS** upon Plaintiff, via his attorneys of record, using the CM / ECF system which causes a true and correct copy of the filed documents to be electronically delivered to all electronically registered parties of record.

Respectfully Submitted,

By: /s/ Evan K. Scott
Evan K. Scott
Assistant Corporation Counsel