

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

JOINT UPDATED STATUS REPORT ON DISCOVERY

Pursuant to the Court's Order of October 23, 2020, the parties submit the following status report on discovery:

I. Deposition Scheduling

The parties have tentatively scheduled the following depositions:

November 18, 2020 Janice Branscomb and Nathaniel Branscomb

December 2, 2020 Cheryl Young

December 4, 2020 Plaintiff

December 11, 2020 Defendant Gregoire

December 16, 2020 Defendants Perez and Kinsey

December 18, 2020 Defendant Brandon

January 6, 2020 Harold Fields

Defendants may seek to depose two Assistant States Attorneys in January. The parties will comply with the Court's Order of October 23, 2020 and file a report on November 13, 2020 with firm confirmed dates for the depositions of Plaintiff and Defendants Perez and Kinsey.

II. Outstanding Discovery Responses

The parties conducted a rule 37.2 conference on November 2, 2020, which identified requests that were still outstanding or awaiting supplementation. Therein, Plaintiff agreed to revisit discovery responses regarding potential witness contact information and social media postings and Defendants agreed to produce personnel files and punitive damages discovery. Both parties agreed and anticipate all outstanding requests will be produced and/or supplemented before Plaintiff's deposition on December 4, 2020. Defendants also are tendering, on November 2, 2020, approximately one hundred and sixty (160) additional pages of documents responsive to Plaintiff's discovery requests.

Respectfully submitted,

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