

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

Anthony Murdock, <i>et al.</i> ,)	
)	
<i>Plaintiff,</i>)	
)	20-cv-1440
-vs-)	
)	(Judge Feinerman)
City of Chicago,)	
)	
<i>Defendant.</i>)	

JOINT STATUS REPORT

The Parties, by their undersigned counsel, submit the following joint status report in compliance with the Court's order of April 13, 2022 (ECF No. 105):

1. Discovery Completed and Scheduled

Plaintiffs produced additional documents about their criminal histories, and responded to the City of Chicago's Requests for Admissions on April 15, 2022

The deposition of plaintiff Brian Neals was completed on June 21, 2022. The deposition of plaintiff Anthony Murdock is scheduled for July 5, 2022. The parties are working to schedule the remaining plaintiffs' depositions for the week of July 5, 2022.

2. Discovery that Remains to Be Taken

The parties, subject to the approval of the Court, expect to complete the depositions of all plaintiffs by July 15, 2022. Plaintiffs expect to propound

a request to admit concerning the number of persons who have been subjected to the challenged policy and are contemplating a Rule 30(b)(6) deposition. Any additional written discovery requests will be propounded by July 5, 2022.

3. Foreseeable Obstacles to Meeting Deadlines

The parties request that the Court reset as follows the schedule set in its order of April 13, 2022:

- A. Fact discovery deadline: August 5, 2022.
- B. Plaintiffs to supplement or amend their class certification motion by August 1, 2022.
- C. Defendant shall respond to the motion by September 16, 2022.
- D. Plaintiffs shall reply by October 7, 2022.

4. Settlement Conference

The parties do not believe that a settlement conference would be productive at this stage of the case.

5. Need for Status Hearing

The parties do not believe there is a need for the status hearing if the Court accepts the proposal to reset the pre-trial schedule.

[signatures on next page]

Dated: June 21, 2022

ANTHONY MURDOCK, et al.

/s/ Kenneth N. Flaxman

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Respectfully submitted,

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