

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

Anthony Murdock,)
)
)
 Plaintiff,)
)
)
 -vs-)
)
)
City of Chicago,)
)
)
 Defendant.)

JOINT STATUS REPORT

The parties submit the following in compliance with the Court's order of August 24, 2020:

1. The parties have made their initial disclosures. Each party served written discovery requests on September 24, 2020. The parties are negotiating a confidentiality order and will present an agreed order or ask the Court to resolve any disputes (with an agreed briefing schedule) by November 17, 2020. Neither party has been able to timely answer the written discovery; the parties have agreed to serve responses by November 25, 2020.

2. Discovery to be taken: defendant will depose the named plaintiff. Plaintiff intends to request leave to add additional plaintiffs; defendants will likely seek to depose these additional plaintiffs. Plaintiff expects to take the depositions of corporate representatives and policymakers of defendant, and will be able to better outline his additional projected discovery after defendant responds to the outstanding discovery requests.

3. The discovery cutoff of April 22, 2021 appears unrealistic. The continued delays and distractions from the COVID pandemic have slowed the efforts of both parties to respond to discovery. The parties suggest that the Court reset the pre-trial schedule after the parties have completed responded to written discovery.

4. The parties suggest that the Court continue the status hearing to a date in December 2020 that is convenient to the Court.

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