

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

Anthony Murdock,)
)
 Plaintiff,)
) 20-cv-1440
 -vs-)
) (Judge Feinerman)
 City of Chicago,)
)
 Defendant.)

JOINT STATUS REPORT

The parties submit the following in compliance with the Court's Order of January 25, 2021:

A. Discovery that Has Been Completed

1. The parties have exchanged written discovery requests and partial responses and have conferred about those responses.
2. The parties resolved one dispute about documents defendant produced on January 17, 2021; defendant then re-produced the documents without redactions on February 10, 2021.
3. The parties have exhausted the conferral process about another dispute about defendant's discovery responses; plaintiff will file a motion to compel by February 19, 2021.
4. Defendant has not yet fully responded to plaintiff's Request for Production 1, which seeks documents about the creation, preparation, modification, review, or revision of Chicago Police Department Special Order S06-12-

02. Defendant has stated that it needs additional time to produce these documents or a privilege log and that defendant will make every effort to get these documents to Plaintiff on or before March 1, 2021. Plaintiff requests that the Court enter an order requiring production of the documents or a privilege log by March 1, 2021.

B. Discovery that Remains to be Taken

5. In addition to the outstanding written discovery discussed above, the parties expect the following oral discovery: once they are identified and documents are produced, plaintiff will depose the persons involved in the creation and implementation of Chicago Police Department Special Order S06-12-02; defendant will depose the named plaintiff. Plaintiff will seek leave to add additional plaintiffs, and defendant will depose any additional plaintiffs. The parties will confer about future discovery after the outstanding written discovery is produced.

C. Foreseeable Obstacles to Meeting Deadlines

6. In light of the delays in completing written discovery, the parties will not be able to complete discovery by April 22, 2021, and plaintiff will not be able to meet the March 25, 2021 date to amend and add additional plaintiffs.

7. The parties request that the Court re-set the deadline to amend to April 26, 2021 and re-set the discovery deadline after plaintiff files the amended complaint and defendant has responded to the outstanding discovery.

D. Settlement

8. The parties do not jointly request a settlement conference.

E. Need for Status Hearing

9. The February 23, 2021 status hearing may be helpful to discuss plaintiff's motion to compel, which will be filed on or before February 19, 2021.

Respectfully submitted,

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