

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

Anthony Murdock, *et al.*, )  
                                  )  
                                  )  
                                  *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 December 16, 2021:

**1. New Counsel for Defendant**

Defendant, the City of Chicago ("City") is now represented by attorneys Adam Decker, Allan Slagel, Elizabeth Winkowski, and Elizabeth Babitt from the law firm of Taft Stettinius & Hollister LLP. Assistant Corporation Counsel Raoul Mowatt also represents the City. The City intends to file a motion for substitution of counsel that would withdraw Mr. Mowatt's appearance for the City.

**2. Outstanding Fact Discovery**

The City will produce documents responsive to Plaintiffs' Fourth Request for Production of Documents on or before March 28, 2022. The City will respond to Plaintiffs' Second Requests for Admission on or before February 18, 2022.

Plaintiffs request that the Court dismiss plaintiffs Fischer, Lowe, McGee, and Perry without prejudice to their seeking to participate in the case as absent members of a class, and without prejudice to Defendant objecting to such participation.

The parties may propound additional written discovery requests on or before April 18, 2022.

The City intends to depose the named Plaintiffs and certain third-party witnesses, including assistant states attorneys.

### **3. Proposed Schedule**

The parties suggest that the Court defer setting a fact discovery date and date for the filing of Plaintiffs' impending amended motion for class certification until May 2022, after the parties have completed the discovery itemized above.

### **4. Settlement Conference**

The parties do not believe that a settlement conference would be productive at this time.

### **5. Need for Status Hearing**

The parties do not believe that there is a present need for a status hearing.

[signatures on next page]

Dated: February 9, 2022

CELIA MEZA  
Corporation Counsel for the  
City of Chicago

By: /s/ Elizabeth E. Babbitt

***Special Assistant Corporation Counsel  
for Defendant***

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Anthony Murdock, et al.

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