

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

JOINT STATUS REPORT

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

1. The Parties are in the Process of Completing Discovery

The parties have exchanged written discovery requests. Defendants City of Chicago, Garduno, Spicuzza, and Ortiz have responded to Plaintiff's interrogatories. The parties have agreed that plaintiff, defendant Davros, defendant Doolin, and defendant City of Chicago will respond to any outstanding written discovery on or before March 15, 2021. Per this Court's January 25, 2021 Order, fact discovery shall close on June 2, 2021.

2. Discovery that Remains to be Taken

In addition to the outstanding written discovery discussed above, the parties expect the following oral discovery: depositions of plaintiff, the four individual defendants, any other individuals with knowledge of or witnesses to plaintiff's arrest, the Assistant Cook County State's Attorneys involved in plaintiff's state

court case that forms the basis of his malicious prosecution claim against the City, and any additional witnesses identified in the course of completion of written discovery.

3. Foreseeable Obstacles to Meeting Deadlines

None at this time.

4. Settlement

The parties do not jointly request a settlement conference.

5. Need for Status Hearing

The parties do not believe there is a need for the March 9, 2021 status hearing.

Respectfully submitted,

/s/ Joel A. Flaxman

Joel A. Flaxman
Kenneth N. Flaxman
200 S Michigan Ave Ste 201
Chicago, IL 60604-2430
(312) 427-3200
jaf@kenlaw.com
Attorneys for Plaintiff

/s/ Elaine C. Davenport

Elaine C. Davenport
Special Assistant Corporation Counsel
SANCHEZ DANIELS &
HOFFMAN LLP
333 West Wacker Drive
Suite 500
Chicago, Illinois 60606
(312) 641-1555
edavenport@sanchezdh.com
Attorney for Defendants Garduno,
Spicuzza, Ortiz, Davros, and Doolin

/s/ Anne L. Yonover

Allan T. Slagel
Elizabeth E. Babbitt
Anne L. Yonover
Adam W. Decker
Special Assistant Corporation Counsel
TAFT STETTINIUS & HOLLISTER
LLP
111 East Wacker Drive
Suite 2800
Chicago, Illinois 60601
(312) 527-4000
aslagel@taftlaw.com
ebabbitt@taftlaw.com
ayonover@taftlaw.com
adecker@taftlaw.com
Attorneys for Defendant City of Chicago