

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

Jevarreo Kelley-Lomax,)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	No. 20-cv-4595
)	
City of Chicago, Robert Garduno,)	<i>(Judge Feinerman)</i>
Anthony Spicuzza, Joel Ortiz,)	
George Davros, and William)	
Doolin,)	
)	
<i>Defendants.</i>)	

JOINT STATUS REPORT

The parties submit the following in compliance with the Court's Order of May 26, 2021:

1. Discovery Completed Thus Far

The parties have exchanged written discovery requests and responses.

2. Discovery that Remains to be Taken

The parties are scheduling party depositions and expect the depositions of plaintiff and the individual defendants to be completed by August 31, 2021.

Defendants also intend to proceed with the following depositions:

- A.S.A. C. Nevins
- Travell Adams
- Isaiah Dukes
- Gary Blue
- Isaiah Kelly-Hawkins

The following records subpoenas served by defendants are outstanding:

Entity	Issue Date	Deadline
Cook County State's Attorney - Civil Actions Bureau and Criminal Prosecutions Bureau	6/8/2021	7/8/2021 8/2/21 Extension
EAN HOLDINGS, LLC (d/b/a Enterprise Rent-a-Car)	7/8/2021	7/21/2021

3. Foreseeable Obstacles to Meeting Deadlines

Defendants do not feel that they will be able to complete all fact discovery by the 31 August 2021 deadline. Defendants, without objection by plaintiff, respectfully request an additional 60-day extension to 1 November 2021 to complete the outstanding discovery listed *supra*.

4. Settlement

Plaintiff submitted a settlement demand to defendants on March 22, 2021. Defendants are in the process of evaluating Plaintiff's demand. The parties do not jointly request a settlement conference at this time.

5. Need for Status Hearing

The parties do not believe there is a need for the July 27, 2021 status hearing.

Respectfully submitted,

[signatures on next page]

/s/ Joel A. Flaxman

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