

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

Jeana K. Reinbold, solely as Chapter 7	)	
Trustee of the Bankruptcy Estate of	)	
Chauncey Ramon Carnes,	)	
	)	
	)	
<i>Plaintiff,</i>	)	No. 20-cv-06214
	)	
-vs-	)	Hon. Franklin U. Valderrama
	)	
City of Chicago and Chicago Police	)	Magistrate Judge Sunil R. Harjani
Officers Delgado #4780 and Swank,	)	
#11337,	)	
<i>Defendants.</i>	)	

**JOINT UPDATED STATUS REPORT**

Plaintiff, JEANA K. REINBOLD, solely as Chapter 7 Trustee of the Bankruptcy Estate of Chauncey Ramon Carnes, and Defendants, City of Chicago, by and through its attorney Celia Meza, Acting Corporation Counsel for the City of Chicago, and City of Chicago Police Officer Delgado and Police Officer Swank, by and through their respective attorneys, Eileen M. Letts and Peter F. Heraty of Zuber Lawler,& Del Duca LLP, hereby submit their Joint Updated Status Report pursuant to the court order entered March 18, 2021, as follows:

**I. Discovery:**

- A. The parties have exchanged their Initial Rule 26(I)(a) Discovery responses.
- B. The parties have exchanged their initial written discovery requests and all parties have responded.
- C. On March 3, 2021, Plaintiff issued a subpoena, returnable March 24, 2021, to the Keeper of LEADS records for any query to the LEADS system concerning Chauncey Ramon Carnes to which answers were served on all parties on March 29, 2021.
- D. On April 2, 2021, Officers Delgado and Swank served notices of deposition on Plaintiff, Jeannie Reinbold for May 27, 2021 and on Chauncey Carnes for June 2, 2021.

- E. Plaintiff issued supplemental discovery requests on Defendants on April 30, 2021 and May 3, 2021.
- F. Plaintiff indicated a desire to take Defendants Swank and Delgado's depositions as well as Det. Figueroa. No dates have been set.
- G. Defendants filed a motion for a confidentiality order on May 4, 2021. Plaintiff opposes this motion and will file her response on or before May 12, 2021.

## **II. Settlement**

On February 26, 2021, the Defendants jointly served on Plaintiff an Offer of Judgment which was not accepted. The parties have not conducted further settlement discussions.

## **III. The Amended Complaint**

Plaintiff, with the consent of defendants, filed an amended complaint on May 4, 2021. Defendants' responses to the amended complaint are due on May 18, 2021.

The amended complaint adds a *Monell* claim against defendant City of Chicago. The parties estimate that the this claim will require additional time to complete discovery and propose an extension of fact discovery from June 18, 2021 to September 20, 2021.

Dated: May 5, 2021

FOR PLAINTIFF REINBOLD:

/s/ Joel A. Flaxman

Joel A. Flaxman

FOR DEFENDANT CITY OF CHICAGO

CELIA MEZA

Acting Corporation Counsel

By /s/ Cheryl Friedman

Cheryl Friedman

Assistant Corporation Counsel

FOR DEFENDANT OFFICERS DELGADO AND SWANK

/s/ Eileen M. Letts

Eileen M. Letts,

Zuber Lawler & Del Duca LLP