

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

KRYSTAL ARCHIE, for herself and on behalf of her minor children, SAVANNAH BROWN, TELIA BROWN, and JHAIMARION JACKSON,)	No. 19-cv-04838
Plaintiffs,)	Judge Robert W. Gettleman
v.)	Magistrate Judge Jeffrey Cummings
THE CITY OF CHICAGO, et al.)	
Defendants.)	
TYERIE JOHNSON,)	No. 20-cv-7222
Plaintiff,)	
v.)	Judge Sara L. Ellis
CITY OF CHICAGO, et al.,)	Magistrate Judge Maria Valdez
Defendants.)	
DOMINIQUE TURNER, for herself and on behalf of her minor children, TJ1, TJ2, TJ3, and TJ4,)	No. 21-cv-704
Plaintiffs,)	Judge Thomas M. Durkin
v.)	Magistrate Judge Jeffrey Cummings
CITY OF CHICAGO, et al.,)	
Defendants.)	

JOINT STATUS REPORT

NOW COME the Parties, by and through their respective counsel, and pursuant to the Court's August 4, 2021 Order, provide a joint status report, stating as follows:

On August 4, 2021, the Court issued the following order, stating in part:

By 8/18/21, counsel for the parties shall meet and confer and file a joint status report setting forth: (1) what discovery has been completed; (2) what discovery remains to be conducted, including a plan for any remaining depositions; and (3) whether any discovery disputes require the Court's attention.

(Dkt. 175).

A. Completed Discovery

Krystal Archie, et al. v. City of Chicago, et al. (19 CV 4838)

The Parties have exchanged Rule 26(a)(1) Disclosures with accompanying materials, including Body Worn Camera videos from the first two search warrants at issue in this case. All parties have answered written discovery, and the parties have produced a substantial amount of materials relating to the underlying incidents. Defendants have recently produced a substantial amount of documentation relating to the Officers, and are in the process of receiving additional records and will continue producing same on a rolling basis.

Tyerie Johnson v. City of Chicago, et al. (20 CV 7222)

No discovery has been conducted in this case. Defendants' fully briefed Motions to Dismiss are pending.

Dominique Turner, et al. v. City of Chicago, et al. (21 CV 704)

No discovery has been conducted in this case as Defendants' Motions to Dismiss the Amended Complaint are still being briefed.

B. Remaining Discovery, Including Depositions

In *Johnson* and *Turner*, all discovery remains to be conducted. In *Archie*, document productions relating to employment and CR records of the Defendant Officers are ongoing. In addition, the City's Motion to Bifurcate in *Archie* is currently pending and has a ruling date of August 25, 2021. That ruling will likely impact the anticipated scope of discovery.

The Parties have not yet begun scheduling depositions. Based on the continuing document productions, the Parties anticipate beginning Officers' depositions in late September or October. The Parties expect that the affiant officers for the February 8, 2019 and April 25, 2019 search warrants, Officers Westman and Anderson, will be deposed first, along with the supervisors on scene for the execution of those search warrants.

C. Discovery Disputes

There are currently no discovery disputes that require the Court's attention. However, the parties need to confer regarding document production to date, especially with depositions approaching, and the Parties anticipate that there could be potential discovery disputes regarding the scope of the document production, including if *Monell* discovery is ordered to proceed. The Parties would endeavor to discuss and work out such issues in good faith prior to any motion practice.

Respectfully submitted,

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