

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

JOINT STATUS REPORT

The parties, by counsel, submit this status report pursuant to the Court's Order of May 31, 2023:

I. Status of written discovery

Defendants estimated in the last joint status report that they would complete their document production by July 14, 2023. Since the last joint status defendants have not produced any documents. Defendants now estimate that they will complete the production by July 28, 2023.

Plaintiff's position is that defendants should produce the materials on a rolling basis to avoid further delays.

II. Depositions the parties intend to take

The parties will schedule the depositions referred to in their previous status report after defendants complete their document production.

III. Settlement

Plaintiff submitted a settlement proposal on September 12, 2022, and defendants have not responded. The parties do not request a settlement conference at this time.

IV. Any Other Issues

Plaintiff suggests that the Court order the filing of a status report on or before August 5, 2023, to update the Court about the status of document production and, if the documents have not been produced by that date, to schedule an in-person status hearing.

Plaintiff also suggests that the Court order defendants to respond to plaintiff's settlement proposal.

Respectfully submitted,

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