

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

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of July 25, 2023:

I. Status of written discovery

Defendants supplemented their discovery responses on July 28, 2023, and informed plaintiff that there are still CR files outstanding that defendants have ordered but not yet received. To date, Defendants have tendered approximately 20 CR files and there are 5 CR files outstanding. Defendants have followed up with COPA and will further supplement their discovery responses as they receive the CR files.

II. Proposed schedule of depositions

The parties have scheduled the depositions of plaintiff and two eyewitnesses: Plaintiff is scheduled to be deposed on September 1, 2023, and Nathaniel Johnson and James McIntyre are scheduled to be deposed on

August 31, 2023. The parties are working together to set mutually acceptable dates for depositions of Defendants in September and October.

Defendants also intend to seek the depositions of forensic scientist Joseph Gillon, Defense attorney David Gaeger, ASA Maiesha Gaptiste, and ASA Luka Jankovic. Plaintiff objects to the taking of these depositions based on relevance and proportionality, and the parties will confer about their disagreement.

III. Settlement

On August 2, 2023, defendants responded to plaintiff's settlement proposal of September 12, 2022. Defendants did not accept the proposal and made no counter-proposal.

IV. Any Other Issues

Plaintiff's view is that defendants' settlement position is unreasonable and requests that the court schedule a settlement conference.

Respectfully submitted,

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