

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 May 28, 2025:

The parties held another conference with Magistrate Judge Valdez about settlement of various cases that were previously part of the Watts Coordinated Proceedings on June 3, 2025. Magistrate Valdez scheduled another conference for June 11, 2025.

The parties propose that the Court postpone the status hearing set for June 10, 2025, until after June 11, 2025. At the next status hearing, the parties will be prepared to update the court on possible global settlement discussions and on their proposals for proceeding with discovery in this case.

Respectfully submitted,

/s/ Joel A. Flaxman  
Joel A. Flaxman  
ARDC No. 6292818  
Kenneth N. Flaxman  
200 S Michigan Ave, Ste 201

Chicago, IL 60604  
(312) 427-3200  
*attorneys for plaintiff*

/s/ Paul A. Michalik (by consent)  
Daniel M. Noland  
Terrence M. Burns  
Paul A. Michalik  
Katherine C. Morrison  
Daniel J. Burns  
Dhaviella N. Harris  
Burns Noland LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
(312) 982-0090  
*attorneys for defendants Chicago,  
Cline, and Kirby*

/s/ Brian P. Gainer (by consent)  
Brian P. Gainer  
Monica Burkoth  
Lisa M. McElroy  
Johnson & Bell, Ltd.  
33 West Monroe St., Ste 2700  
Chicago, IL 60603  
(312) 372-0770  
*attorneys for defendant Ronald Watts*

/s/ Eric S. Palles (by consent)  
Eric S. Palles  
Sean M. Sullivan  
Lisa Altukhova  
Mohan Groble Scolaro, PC  
55 West Monroe St., Ste 1600  
Chicago, IL 60603  
(312) 422-9999  
*attorneys for defendant Mohammed*

/s/ Jason M. Marx (by consent)  
Special Assistant Corporation Counsel  
Andrew M. Hale  
Anthony E. Zecchin  
Jason M. Marx

Kelly M. Olivier  
Hannah Beswick-Hale  
Hale & Monico LLC  
53 West Jackson Blvd., Ste 334  
Chicago, IL 60604  
(312) 341-9646  
*attorneys for remaining defendants*