

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

Jerome Fears,)	
)	
<i>Plaintiff</i>)	
)	No. 22-cv-5347
<i>-vs-</i>)	
)	<i>(Judge Bucklo)</i>
City of Chicago, Phillip Cline,)	
Debra Kirby, Ronald Watts, and)	
Kallatt Mohammed,)	
)	
<i>Defendants</i>)	

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of December 27, 2023:

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 170 cases that are coordinated for pretrial proceedings. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

On January 20, 2023, the parties submitted a joint status report in the coordinated proceedings, indicating that the parties have agreed on a list of 19 proposed "test cases." ECF No. 393 in Case No. 19-cv-1717. The parties will focus on litigating the 19 "test cases" to their conclusion to help the parties assess the value and merit of the remaining cases. This case is not one of the test cases.

On April 13, 2023, Magistrate Judge Finnegan stayed discovery in non-test cases, including this cases, for at least six months, when the issue will be revisited. ECF No. 491 in Case No. 19-cv-1717. Magistrate Judge Finnegan recently requested that the parties confer about a plan for discovery in the non-test cases.

Trial dates have been set in four of the test cases: *Baker v. Chicago*, 16-cv-8940 (January 8, 2025); *Gipson v. Chicago*, 18-cv-5120 (April 21, 2025); *Carter v. Chicago*, 17-cv-7241 (May 27, 2025); *White v. Chicago*, 17-cv-2877 (July 7, 2025).

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
Reiter Burns LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090

*attorneys for defendants City of
Chicago, Philip Cline, and Debra
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