

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 July 3, 2024:

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 186 cases that are coordinated for pretrial proceedings. ECF No. 20. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

Discovery has been stayed in the majority of these cases, including this one, while the parties focus on litigating 19 test cases.

On September 30, 2024, the Watts coordinated cases were scheduled to be returned to the assigned district judges for completion of pretrial proceedings and trial. 19-cv-1717, ECF No. 798 at 3 n.3. However, as of this date, there has been no order entered terminating the Coordinated

Proceedings. Magistrate Judge Finnegan has scheduled a status hearing for October 15, 2024, in the Coordinated Proceedings. 19-cv-1717, ECF No. 818.

The parties propose that the Court enter an Order to submit, on or before October 31, 2024, a joint report on the status of the Coordinated Proceedings, or, if the Coordinated Proceedings have terminated and this case returned to this Court, a proposed discovery plan.

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 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