

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

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

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of November 25, 2024:

The parties have exchanged Rule 26 disclosures and plaintiff has answered written discovery requests. The parties will schedule depositions next.

Counsel for the parties have been engaged in settlement negotiations in several cases that were part of the Coordinated Proceedings. The parties intend to seek a settlement referral in this case at an appropriate time in the future.

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