

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

Sean McClendon,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
-vs-	)	No. 22-cv-5472
	)	
City of Chicago, Milot Cadichon,	)	(Judge Coleman)
#17711, Bryant McDermott,	)	
#12659, Robert McHale, #15902,	)	(Magistrate Judge Valdez)
Donald Smith, #10257,	)	
	)	
<i>Defendants.</i>	)	

**JOINT STATUS REPORT**

The parties, by counsel, submit this report pursuant to the Court's Order of November 17, 2023:

**Discovery Progress:** The parties have completed the depositions of plaintiff, defendants McDermott and Smith, and third-party witnesses Emmanuel Poe and Ken Ross. Plaintiff has noticed the depositions of defendants Cadichon (1/26/24) and McHale (1/18/24) and Officer Dorian Wright (1/19/24), an employee of defendant City of Chicago. Defendants have confirmed the date for the deposition of Cadichon. Defendants intend to notice the unopposed depositions of two damages witnesses, Latoya McClendon and Lori Wesson. Defendants also intend to notice the opposed depositions of Brittany Hill and Moneka Curtis, but the parties will confer about that dispute in the hopes of avoiding any necessary intervention by the Court.

The parties are also conferring about the discoverability of recorded jail and prison phone calls, and may seek court assistance on that issue as well.

**Prospects of Settlement:** The parties will confer about settlement after fact discovery is completed.

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/ Brian Wilson (by consent)

Brian Wilson  
Avi Kamionski  
Shneur Nathan  
Special Assistant Corporation Counsel  
NATHAN & KAMIONSKI, LLP  
33 W. Monroe, Suite 1830  
Chicago, IL, 60603  
312-957-6649  
bwilson@nklawllp.com  
*attorneys for defendant City of  
Chicago*

/s/ Lisa M. McElroy (by consent)

Lisa M. McElroy  
Brian P. Gainer  
Johnson & Bell, Ltd.  
33 West Monroe St., Ste 2700  
Chicago, IL 60603  
(312) 372-0770  
mcelroyl@jbltd.com  
*attorneys for defendants Cadichon,  
McDermott, McHale, and Smith*