

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

**AGREED MOTION TO TAKE TWO
DEPOSITIONS AFTER DISCOVERY DEADLINE**

The parties, by counsel, respectfully request that the Court authorize the parties to take two depositions that the parties have been attempting to schedule since October of 2023 on dates that fall after the current fact discovery deadline of January 31, 2024. (ECF No. 66.)

Grounds for this motion are as follows:

1. **Officer Dorian Wright.** Chicago Police Officer Dorian Wright testified at plaintiff's criminal trial that he recovered the gun with which plaintiff was charged.
2. Plaintiff requested in October of 2023 that counsel for the City of Chicago produce Wright for a deposition, and counsel for the City agreed.
3. On December 22, 2023, plaintiff served a notice for Wright's deposition to proceed on January 19, 2024.

4. Officer Wright was unable to attend his deposition on January 19, 2024, because he was on leave.

5. The parties have agreed to hold the deposition of Officer Wright on February 5, 2024.

6. **Lori Wesson.** Plaintiff's mother Lori Wesson has been disclosed as one of plaintiff's damages witnesses.

7. Defense counsel requested in October of 2023 that plaintiff's counsel arrange for Ms. Wesson to appear for deposition, and plaintiff's counsel agreed.

8. Defense counsel requested to postpone the deposition of Ms. Wesson until after the Court ruled on defendants' request to listen to recorded jail and prison calls, and plaintiff's counsel agreed.

9. The parties are working together to schedule the deposition of Lori Wesson on or before February 16, 2024.

10. Defendants wish to take discovery beyond these depositions and will file their own motion supporting that request. But Defendants do not oppose this motion as these two depositions are among the discovery that Defendants agree should be completed.

ACCORDINGLY, the parties respectfully requests that the Court authorize the parties to take the deposition of Officer Dorian Wright and

Lori Wesson on dates that fall after the current fact discovery deadline of January 31, 2024.

Respectfully submitted,

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