

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

|                         |   |                         |
|-------------------------|---|-------------------------|
| Michael Flagg,          | ) |                         |
|                         | ) | No. 22-cv-5763          |
| <i>Plaintiff</i>        | ) |                         |
|                         | ) | <i>(Judge Alexakis)</i> |
| -vs-                    | ) |                         |
|                         | ) |                         |
| City of Chicago, et al. | ) |                         |
|                         | ) |                         |
| <i>Defendants</i>       | ) |                         |

**JOINT STATUS REPORT**

The parties, by counsel, submit this joint status report pursuant to the Court's Order of November 13, 2024:

This case was part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 186 cases that are coordinated for pretrial proceedings. ECF No. 20. A great deal of discovery has already taken place in the Coordinated Proceedings, but the parties have not taken any discovery specific to this case. The general type of discovery will be documents and testimony about plaintiff's arrest on January 19, 2002, plaintiff's prosecution, time in custody, claimed damages, and criminal history.

The parties propose the following deadlines:

1. Rule 26(a)(1) disclosures: January 9, 2025.
2. Fact discovery completion date: plaintiff proposes August 9, 2025; defendants propose September 30, 2025.

3. The parties anticipate expert discovery, and suggest that the court set an expert discovery schedule at the close of fact discovery.

Respectfully submitted,

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