

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

## JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of November 15, 2024:

1. All defendants have been served.
2. No extension under Rule 4(m) is necessary.
3. Defendant Watts has answered the complaint. The parties agree that the remaining defendants will answer by January 10, 2025.
4. Proposed fact discovery completion date: August 29, 2025.
5. Expert discovery is contemplated. The parties anticipate that it will be similar to the expert discovery already conducted in cases that were part of

Respectfully submitted,

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