

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

Bruce Walker,)	
)	No. 22-cv-5841
<i>Plaintiff</i>)	
)	<i>(Judge Hunt)</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 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 *In re Watts*, 19-cv-1717.

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 defendant Chicago

/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/ William E. Bazarek (by consent)
Special Assistant Corporation Counsel
William E. Bazarek
Andrew M. Hale
Anthony E. Zecchin
Jason M. Marx
Kelly M. Olivier
Hannah Beswick-Hale
Hale & Monico LLC
53 West Jackson Blvd., Ste 334
Chicago, IL 60604
(312) 341-9646
attorneys for remaining defendants