

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

James Randolph, )  
 )  
 Plaintiff )  
 ) No. 22-cv-5845  
 -vs- )  
 ) (Judge Kennelly)  
 City of Chicago, et al., )  
 )  
 Defendants. )

**JOINT STATUS REPORT**

The parties, by counsel, submit this joint status report pursuant to the Court's Order of December 15, 2022:

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 100 cases that are coordinated for pretrial proceedings. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

On January 20, 2023, the parties submitted a joint status report in the coordinated proceedings, indicating that the parties have agreed on a list of 19 proposed “test cases.” ECF No. 393 in Case No. 19-cv-1717. The parties will focus on litigating the 19 “test cases” to their conclusion to help the parties assess the value and merit of the remaining cases. This case is not one of the test cases.

On February 13, 2023, Magistrate Judge Finnegan set a fact discovery deadline in the test cases of December 18, 2023. ECF No. 419 in Case No. 19-cv-1717.

On April 13, 2023, Magistrate Judge Finnegan stayed discovery in non-test cases, including this one, for at least six months, when the issue will be revisited. ECF No. 491 in Case No. 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  
Reiter Burns LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
(312) 982-0090  
*attorneys for defendants City of Chicago, Philip Cline, and Debra Kirby*

/s/ Brian P. Gainer (by consent)  
Brian P. Gainer  
Monica Gutowski  
Johnson & Bell, Ltd.  
33 West Monroe St., Ste 2700

Chicago, IL 60603  
(312) 372-0770  
*attorneys for defendant Ronald Watts*

/s/ Eric S. Palles (by consent)  
Eric S. Palles  
Sean M. Sullivan  
Daley Mohan Groble P.C  
55 West Monroe St., Ste 1600  
Chicago, IL 60603  
(312) 422-9999  
*attorneys for defendant Mohammed*

/s/ Megan McGrath (by consent)  
James V. Daffada  
Thomas M. Leinenweber  
Kevin E. Zibolski  
Michael J. Schalka  
Megan McGrath  
Leinenweber Baroni & Daffada LLC  
120 North LaSalle Street  
Suite 2000  
Chicago, Illinois 60602  
(312) 663-3003  
*attorneys for defendants Michael  
Spaargaren and Matthew Cadman*

/s/ Kelly M. Olivier (by consent)  
Special Assistant Corporation Counsel  
William E. Bazarek  
Andrew M. Hale  
Anthony E. Zecchin  
Brian J. Stefanich  
Allyson L. West  
Kelly M. Olivier  
Hale & Monico LLC  
53 West Jackson Blvd., Ste 334  
Chicago, IL 60604  
(312) 341-9646  
*attorneys for remaining defendants*