

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

| | | |
|--------------------------|---|-------------------------|
| James Randolph, |) | |
| |) | |
| <i>Plaintiff</i> |) | |
| |) | No. 22-cv-5845 |
| <i>-vs-</i> |) | |
| |) | <i>(Judge Kennelly)</i> |
| 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 June 24, 2023:

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 170 cases that are coordinated for pretrial proceedings. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery. As explained below, discovery in this case is stayed.

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 April 13, 2023, Magistrate Judge Finnegan stayed discovery in non-test cases, including this one. ECF No. 491 in Case No. 19-cv-1717.

Defendants have filed a motion to extend the discovery deadline of December 18, 2023, that applies to the 19 test cases. ECF No. 614 in 19-cv-1717. Defendants have requested an extension to June 30, 2024. *Id.* The first trial in the coordinated proceedings is scheduled to begin on January 8, 2025 in *Baker v. Chicago*, 16-cv-8940. ECF No. 570 in 19-cv-1717. No other trial dates have been set.

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 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/ Eric S. Palles (by consent)
Eric S. Palles
Sean M. Sullivan
Lisa Altukhova
Mohan Groble Scolaro, PC
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/ William E. Bazarek (by consent)
Special Assistant Corporation Counsel
William E. Bazarek
Andrew M. Hale
Anthony E. Zecchin
Jason M. Marx
Kelly M. Olivier
Hale & Monico LLC
53 West Jackson Blvd., Ste 334
Chicago, IL 60604
(312) 341-9646
attorneys for remaining defendants