

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

James Randolph,)	
)	
<i>Plaintiff</i>)	
)	No. 22-cv-5845
-vs-)	
)	(Judge Kennelly)
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 December 21, 2023:

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 186 cases that are coordinated for pretrial proceedings. ECF No. 20. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.

Discovery has been stayed in the majority of these cases, including this one, while the parties focus on litigating 19 test cases.

On September 30, 2024, the Watts coordinated cases are scheduled to be returned to the assigned district judges for completion of pretrial proceedings and trial. 19-cv-1717, ECF No. 798 at 3 n.3. Magistrate Judge Finnegan has scheduled a status hearing for October 10, 2024, in the Coordinated Proceedings. 19-cv-1717, ECF No. 810.

The parties propose that the Court schedule a date after October 10, 2024, by which the parties are to submit a proposed discovery plan under Rule 26(f).

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 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/ James V. Daffada (by consent)
James V. Daffada
Thomas M. Leinenweber
Michael J. Schalka
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
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