

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 November 14, 2024:

**I. Discovery**

This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 186 cases that are coordinated for pretrial proceedings. Pursuant to Judge Valderrama's Order of November 12, 2024, "As of December 2, 2024, the Coordinated Pretrial Proceedings will be concluded and closed." (ECF No. 45.)

A great deal of discovery has already taken place in the Coordinated Proceedings, including *Monell* discovery, but the parties have not taken discovery specific to this case.

The parties anticipate that fact discovery specific to this case will be limited to any witnesses who have specific knowledge relevant to this case as

opposed to witnesses who were disclosed on more general topics in the Coordinated Proceedings. Specifically, the parties anticipate that Defendants will depose Plaintiff and any damage witnesses who are disclosed. Plaintiff will likely depose Defendants, although those depositions may not be necessary if the Defendants have no independent recollection about Plaintiff's arrest.

The parties also anticipate that expert discovery will be similar to the expert discovery that the parties have completed in the Coordinated Proceedings.

## **II. Settlement**

Counsel for plaintiffs in the Coordinated Proceedings and counsel for the City of Chicago recently discussed settlement with Magistrate Judge Finnegan. Both sides are interested in pursuing talks to determine whether settlement is possible. To that end, the parties recently discussed with Magistrate Judge Finnegan the possibility of a judge being designated to assist the parties in continuing settlement negotiations in these cases after Magistrate Judge Finnegan's retirement. Counsel for the parties are currently waiting to hear back from Magistrate Judge Finnegan regarding this issue.

Respectfully submitted,

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