

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

Plaintiff and defendants City of Chicago, Phillip Cline, Debra Kirby, Ronald Watts, Brian Bolton, Matthew Cadman, Darryl Edwards, Robert Gonzalez, Alvin Jones, Manuel Leano, Kallatt Mohammed, Michael Spaargaren, Gerome Summers Jr., and Kenneth Young Jr.,¹ by counsel, submit this joint status report pursuant to the Court's Order of April 24, 2025:

Since the filing of the last status report, the parties took several depositions and fact discovery closed on May 19, 2025. There are still outstanding responses to defendants' subpoenas to the Cook County State's Attorney's Office and the Cook County Public Defender. Defendants anticipate these responsive documents will be produced within the next 10 days. The Court set a schedule for expert disclosures and dispositive motions in its order of December 14, 2024.

¹ Counsel for defendant Calvin Ridgell did not respond to emails circulating drafts of this status report on June 3, 2025.

The parties are communicating about settlement of related cases with the assistance of Magistrate Judge Valdez. The next joint conference is scheduled for June 11, 2025.

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