

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**

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.,<sup>1</sup> 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.

---

<sup>1</sup> 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*