

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

Joseph Thompson,)	
)	No. 22-cv-5847
<i>Plaintiff</i>)	
)	<i>(Judge Alexakis)</i>
-vs-)	
)	
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 13, 2024:

This case was part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 186 cases that are coordinated for pretrial proceedings. ECF No. 20. A great deal of discovery has already taken place in the Coordinated Proceedings, but the parties have not taken any discovery specific to this case. The general type of discovery will be documents and testimony about plaintiff's arrest on November 26, 2002, plaintiff's prosecution, time in custody, claimed damages, and criminal history.

The parties propose the following deadlines:

1. Rule 26(a)(1) disclosures: January 9, 2025.
2. Fact discovery completion date: plaintiff proposes August 9, 2025; defendants propose September 30, 2025.

3. The parties anticipate expert discovery, and suggest that the court set an expert discovery schedule at the close of fact discovery.

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 defendant Chicago

/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 Cadman and
Spaargaren*

/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
Hannah Beswick-Hale
Hale & Monico LLC
53 West Jackson Blvd., Ste 334
Chicago, IL 60604
(312) 341-9646
attorneys for remaining defendants