

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

| | | |
|-----------------------------------|---|-------------------------|
| Derek Walker, |) | |
| |) | |
| <i>Plaintiff,</i> |) | |
| |) | No. 22-cv-5892 |
| <i>-vs-</i> |) | |
| |) | <i>(Judge Alexakis)</i> |
| City of Chicago, Ronald Watts, |) | |
| Brian Bolton, Darryl Edwards, |) | |
| Robert Gonzalez, Alvin Jones, |) | |
| Kallatt Mohammed, Calvin Ridgell, |) | |
| John Rodriguez, Gerome Summers |) | |
| Jr., and Kenneth Young Jr., |) | |
| |) | |
| |) | |
| <i>Defendants.</i> |) | |

JOINT PROPOSED DISCOVERY PLAN

The parties, by counsel, submit this joint proposed discovery plan pursuant to the Court's Order of October 2, 2024:

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. 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 March 10, 2004, plaintiff's prosecution, time in custody, claimed damages, and criminal history.

The parties propose the following deadlines:

1. Rule 26(a)(1) disclosures: December 2, 2024

2. Date to issue first set of written discovery requests: January 9, 2025
3. Fact discovery completion date: July 24, 2025.
4. The parties anticipate expert discovery and dispositive motions, and propose that the Court set those deadlines after the close of fact discovery.

Respectfully submitted,

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