

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

Derek Walker,)	
)	No. 22-cv-5892
<i>Plaintiff,</i>)	
)	<i>(Judge Alexakis)</i>
<i>-vs-</i>)	
)	<i>(Magistrate Judge Appenteng)</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 March 14, 2025:

Plaintiff and all but one defendant have answered written discovery requests. The other defendant will answer on or before May 22, 2025.

The discovery remaining is responding to the written discovery requests and depositions. The parties anticipate depositions of plaintiff, the individual defendants, and the men who were arrested at the same time as plaintiff. The deposition of plaintiff is scheduled for June 3, 2025.

All parties disclosed the names of the six men arrested with plaintiff as witnesses pursuant to Federal Rule of Civil Procedure 26. The parties have scheduled the deposition of one of those men, Anthony Stroud, for June 4, 2025. Two of the men are believed to be deceased, and the parties have not yet located the remaining three men for deposition.

Defense counsel has issued subpoenas for records to the following entities: the Office of the Cook County State's Attorney, the Office of the Cook County Public Defender, the Illinois Department of Corrections, the Illinois Department of Corrections Intelligence Center, the Connect Network, and the Cook County Department of Corrections c/o the Cook County Sheriff's Office. Defendants await responses from each of these entities.

No discovery disputes require the Court's attention at this time.

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 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/ Timothy P. Scahill (by consent)

Steven B. Borkan
Timothy P. Scahill
Borkan & Scahill, Ltd.
20 S. Clark St., Suite 1700
Chicago, IL 60302
(312) 580-1030
attorneys for defendant Ridgell

/s/ Jason M. Marx (by consent)

Special Assistant Corporation Counsel
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