

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 May 9, 2025:

Plaintiff and defendants Watts, Bolton, Edwards, Gonzalez, Jones, Rodriguez, Summers, and Young have answered written discovery requests. Defendants Mohammed and Ridgell will answer on or before June 16, 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, originally scheduled for June 3, 2025, has been rescheduled for July 2, 2025. The parties are working together to schedule the deposition of Anthony Stroud, one of the men arrested at the same time as plaintiff. Defendants are working to locate the other men arrested at the same time as plaintiff. Plaintiff will schedule the depositions of the individual defendants to proceed in July.

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.

The parties anticipate expert discovery that will be similar to the expert discovery in related cases. The parties propose the following schedule for expert discovery: Plaintiff's expert disclosure due on or before August 7, 2025. Defendants' expert disclosures due on or before September 4, 2025.

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*