

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

Antoine White,	)	
	)	
<i>Plaintiff</i>	)	
	)	No. 22-cv-5893
-vs-	)	
	)	(Judge Harjani)
City of Chicago, Ronald Watts,	)	
Darryl Edwards, Alvin Jones,	)	
Kallatt Mohammed, Calvin Ridgell,	)	
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 3, 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 17, 2003, 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. Deadline to amend pleadings and join parties: February 24, 2025
3. Date to issue first-set of written discovery requests: January 9, 2025
4. Final date to issue notices of depositions with agreed upon dates and Rule 45 subpoenas: July 10, 2025.
5. Fact discovery completion date: July 24, 2025. (For claims involving medical conditions, fact discovery ordinarily includes treating physician depositions.)
6. The parties anticipate expert discovery, and an expert discovery schedule will be set at a later time.

Respectfully submitted,

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