

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

Anthony Wright,)	
)	No. 22-cv-5895
<i>Plaintiff</i>)	
)	(Judge Hunt)
-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 May 19, 2025:

Defendants have answered written discovery, and plaintiff will answer written discovery by June 20, 2025. Defendants have issued ten records subpoenas and are still awaiting responses from five of the respondents. Plaintiff's deposition is scheduled for June 30, 2025. Plaintiff also seeks to depose defendants Nichols and Leano.

The depositions of Nichols and Leano will include questioning about this case and multiple other cases. Plaintiff respectfully requests that the Court permit those consolidated depositions to be held after the fact discovery deadline of July 7, 2025. The Court granted a similar request in *Robinson v. Chicago*, 20-cv-2928, ECF No. 104. Counsel for defendants Nichols and Leano does not object to this request.

The parties are communicating about settlement of various cases that were previously part of the Watts Coordinated Proceedings with the assistance of Magistrate Judge Valdez. The next conference with Magistrate Judge Valdez is scheduled for June 24, 2025.

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,
Cline, and Kirby*

/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/ 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