

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

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of November 14, 2024:

The parties request that the Court set a fact discovery deadline before setting a trial date.

This case was part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of 186 cases that were 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 discovery specific to this case.

The parties propose that Rule 26(a) disclosures be exchanged by June 16, 2025, and that the Court set the fact discovery deadline as December 2, 2025.

The parties anticipate expert discovery, and suggest that the court set an expert discovery schedule at the close of fact discovery.

The parties have been 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 3, 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, Rowan, 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 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/ 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