

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

Charles Johnson,	)
	) No. 22-cv-6396
<i>Plaintiff</i>	)
	) ( <i>Judge Valderrama</i> )
-vs-	)
	) ( <i>Magistrate Judge Berry</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 13, 2025:

Both parties have issued written discovery requests. Defendant Watts has responded; Plaintiff and the remaining defendants will respond to the written discovery requests within 28 days. The parties will schedule depositions after written discovery is completed.

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*