

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

Vondell Wilbourn, individually and)	
for others similarly situated,)	
)	No. 23-cv-1782
<i>Plaintiffs,</i>)	
)	(Judge Shah)
-vs-)	
)	
Sheriff of Cook County and Cook)	
County, Illinois,)	
)	
<i>Defendants.</i>)	

PROPOSED RULE 26 SCHEDULE

The parties to this case, by their respective undersigned counsel, proposed the following schedule:

Rule 26 Disclosures	April 15, 2024
Written Discovery to be Propounded	April 29, 2024
Addition of New Parties and Filing of any Amended Complaint	July 15, 2024
Depositions on existence of alleged policy and class maintainability issues to be completed	September 9, 2024
Plaintiffs to file motion for class certification	October 7, 2024
Defendants to respond to motion	November 4, 2024
Plaintiffs to reply	November 25, 2024
Further schedule to be set after ruling on class maintainability The parties agree that witnesses will be presented only once for a deposition and that witnesses presented by September 9, 2024, on the existence of alleged policy and class maintainability issues will not be re-deposed after a ruling on class maintainability absent leave of Court on good cause shown	

Respectfully submitted,

[signatures on next page]

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