

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

# STATUS REPORT

The parties file this joint status report in accordance with the Court's order of September 12, 2024:

1. Defendants have complied with the Court's ruling on plaintiff's motion to compel. (ECF No. 32.)
  2. The parties' progress on discovery has been delayed because plaintiff's lead counsel Kenneth N. Flaxman underwent total knee replacement surgery on October 18, 2024 and does not expect to be able to return to fulltime work until the end of November, 2024.
  3. Accordingly, the parties request that the Court extend the discovery deadline by two months from December 16, 2024 to February 16, 2024.

Respectfully submitted,

[signatures on following page]

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
ARDC No. 08830399  
Joel A. Flaxman  
200 South Michigan Ave Ste 201  
Chicago, Illinois 60604  
(312) 427-3200  
*Attorneys for Plaintiffs*

/s/ Samuel D. Branum (by consent)  
Monica Burkoth  
Samuel D. Branum  
Johnson & Bell, Ltd.  
33 W. Monroe, Ste. 2700  
Chicago, Illinois 60603  
*Attorneys for Defendant*