

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-01782
<i>Plaintiffs,</i>)	
)	<i>(Judge Shah)</i>
-vs-)	
)	
Sheriff of Cook County and Cook)	
County, Illinois,)	
)	
<i>Defendants.</i>)	

STATUS REPORT

The parties file this joint status report in accordance with the Court's order of January 13, 2025.

1. Plaintiff has received communications from six potential class members; defendant has produced documents about the electronic monitoring experiences of those persons and has requested to depose each of those persons. Defendant has also requested plaintiff's deposition. Plaintiff will cooperate in producing these persons, but is skeptical that these depositions can be completed by the current discovery cutoff date of March 31, 2025.

2. Plaintiff has requested defendant to supplement its production of reincarceration incident reports related to program violations. Defendant is in receipt of plaintiff's request and will provide its position to plaintiff by the end of next week. Plaintiff has also requested defendant to produce for

deposition six of the deputy sheriffs who were identified in the reincarceration incident reports.

3. The parties jointly request that the Court allow the parties to complete the fourteen depositions identified above (seven on each side) after the close of fact discovery, allowing the parties up to April 30, 2025, to complete the depositions. Plaintiff does not intend to rely on expert testimony. Defendant has not yet made a final decision on whether it will be disclosing an expert. The parties propose the following briefing schedule on class certification, expert discovery, and dispositive motions:

- Plaintiff's motion for class certification due by May 15, 2025
- Defendant's response to motion for class certification due by June 5, 2025
- Plaintiff's reply in support of class certification due by June 12, 2025
- Defendant's expert disclosure, if any, due by June 12, 2025
- Deposition of Defendant's expert, if any, to be completed by July 3, 2025
- Dispositive motions due by July 17, 2025
- Responses to dispositive motions due by August 14, 2025
- Replies in support of dispositive motions due by September 4, 2025

Respectfully submitted,

[signatures on next page]

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