

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MADELINE MENDOZA,	)	
	)	Case No. 23-cv-2441
Plaintiff,	)	
	)	Honorable Judge Durkin
v.	)	
	)	
CITY OF CHICAGO, et al,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

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MARILYN MULERO,	)	
	)	Case No. 23-cv-14795
Plaintiff,	)	
	)	Honorable Judge Durkin
v.	)	
	)	
REYNALDO GUEVARA, et al,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**DEFENDANTS’ JOINT SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES**

Defendants, by their attorneys, jointly submit the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

i. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

**RESPONSE:** Any and all individuals named in documents produced to Plaintiffs as part of these disclosures, including but not limited to:

1. Plaintiff Madeline Mendoza (“Tuti”), to be contacted through her counsel, may testify concerning the facts of the alleged incident and the alleged damages giving rise to her present lawsuit.
2. Plaintiff Marilyn Mulero (“Mari” or “Muneca”), to be contacted through her counsel, may testify concerning the facts of the alleged incident and the alleged damages giving rise to her present lawsuit.

3. Defendant Reynaldo Guevara, to be contacted through his counsel, may testify regarding the allegations in Plaintiffs' Complaints, any reports he authored or assisted in authoring, and his training and experience, as well as information regarding Plaintiffs' claims for punitive damages.
4. Defendant Stephen Gawrys, to be contacted through his counsel, may testify regarding the allegations in Plaintiffs' Complaints, any reports he authored or assisted in authoring, and his training and experience, as well as information regarding Plaintiffs' claims for punitive damages.
5. Defendant Anthony Riccio, to be contacted through his counsel, may testify regarding the allegations in Plaintiffs' Complaints, any reports he authored or assisted in authoring, and his training and experience, as well as information regarding Plaintiffs' claims for punitive damages.
6. Defendant Robert Biebel, to be contacted through his counsel, may testify regarding the allegations in Plaintiffs' Complaints, any reports he authored or assisted in authoring, and his training and experience, as well as information regarding Plaintiffs' claims for punitive damages.
7. Jacqueline Montanez ("Loca D") (last known address: 1837 N. Mozart, Chicago, IL) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.
8. Magnolia Wright (address unknown) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to the police investigation.
9. Maria Suez (address unknown) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following the crimes, including but not limited to during the police investigation.
10. Ivette Rodriguez (last known address: 8951 NE 8th Avenue, Miami, Florida) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.
11. Jackie Serrano (Deceased) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.
12. Marilyn Serrano (last known address: 3712 W. Wrightwood, Chicago) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy

Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.

13. Joan Roberts (last known address: 5013 N. Rutherford Avenue, Chicago) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.
14. David Feliciano (address unknown) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
15. Felix Rodriguez (address unknown) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during police investigation.
16. Detective Lawrence Poli (Star #20710), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
17. Detective John Dolan (Star #20684), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
18. Michael Deppe (address unknown) may testify regarding his assessment of the crime scene involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations about that assessment and his affidavit concerning it, and his training and experience as a police officer specializing in on-scene investigation, mapping, and measuring.
19. Joseph T. Kirk (Deceased) may testify regarding his assessment of the crime scene involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations about that assessment and his affidavit concerning it, and his training and experience as a police officer specializing in on-scene investigation, mapping, and measuring.
20. Officer R. Castro (Star #17241), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored

21. Officer T. Morales (Star #6833), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
22. Lieutenant H. O'Malley (Star #249), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
23. Sergeant R. Trusz (Star #1146), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
24. Officer J. Wasco (Star #15056), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
25. Officer C. Saledino (Star #16094), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
26. Officer A. Wronkowski (Star #10666), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
27. Officer M. Meade (Star #13813), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
28. Officer R. Bay (Star #17088), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
29. Officer S. Hund (Star #12901), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.

30. Henry Belardo (last known address: 1058 N. Christiana Ave, Chicago) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
31. Antonio Aponte (last known address: 3030 N. Nottingham Avenue, Chicago) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
32. Evidence Technician T. Bachelder (Star #12680), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
33. Evidence Technician F. Demarco (Star #12802), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
34. Officer T. Brand (Star #15893), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
35. Officer S. Bosnyak (Star #5253), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
36. Kimberly Hawkins (last known address: 1357 W. Ohio – 4th floor, Chicago) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.
37. “Eugene” (last known address: 1701 N. Albany – 2nd floor, Chicago) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
38. Officer V. Rivera (Star #11520), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.

39. Former Assistant State's Attorney John Dillon, to be contacted through the Cook County State's Attorney's Office, may testify regarding the allegations in Plaintiffs' Complaints, including but not limited to any reports he authored or assisted in authoring, statements taken, and his approval of felony charges in the murders of Jimmy Cruz and Hector Reyes.
40. Court reporter Annette Moriarty (last known address: Metro Reporting Service, 311 S. County Farm Road – Suite F, Wheaton, Illinois), may testify regarding the facts and circumstances regarding the oral statements given by Jacqueline Montanez and Marilyn Mulero about the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes.
41. Former Assistant State's Attorney Thomas Reich, to be contacted through the Cook County State's Attorney's Office, may testify regarding the allegations in Plaintiffs' Complaints, including but not limited to any reports he authored or assisted in authoring, statements taken, and his approval of felony charges in the murders of Jimmy Cruz and Hector Reyes.
42. Detective R. Szeluga (Star #20659), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
43. Jaime Cruz (last known address: 13123 S. Buffalo Avenue, Chicago) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
44. Omar Munoz (last known address: 1452 N. Kedzie – basement, Chicago) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
45. Luis Reyes (last known address: 1017 N. Sacramento – 1st floor, Chicago) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
46. Detective Robert Wasmund (Star #20835), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
47. Dr. Nancy Jones, to be contacted through counsel for the Cook County Medical Examiner's Office, may testify regarding the autopsy performed on the decedents Jimmy Cruz and Hector Reyes, the injuries they sustained, and the cause of death.

48. Detective T. Lazar (Star #20851), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
49. Officer T. Shouse (Star #4522), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
50. Officer E. Negron (Star #7277), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
51. Officer R. Remnes (Star #17013), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
52. Officer A. Arguijo (Star #8910) (Deceased), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
53. Evidence Technician L. Krause (Star #3372), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
54. Evidence Technician P. Salter (Star #13420), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
55. Officer John Carey (Star #13537), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
56. Officer O. Brumfield (Star #7205), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.



57. Youth Officer Robert Pulia (Star #16011), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
58. GCSP A. O'Quinn (Star #8153), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
59. GCSP M. Cusack (Star #11895), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
60. Angel Rodriguez (address unknown) may testify regarding his knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as his conversations and observations following these crimes, including but not limited to during the police investigation.
61. Rhonda Riley (last known address: 1009 N. California - #1, Chicago) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations prior to and following these crimes, including but not limited to during the police investigation.
62. Officer James Leary (Star # unknown), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
63. Officer Stronski (Star #7907), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
64. Iris Maria Perez (last known address: 1920 N. Washtenaw – 1st floor, Chicago) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes, including but not limited to during the police investigation.
65. Michael Kovar, PhD (last known address: 30 N Michigan Ave, Ste 1126, Chicago) may testify to unprivileged conversations with Plaintiff Marilyn Mulero, his role as Clinical Psychologist, and any other information he may have related to the facts alleged in Plaintiffs' Complaints.

66. Michael Gelbort, PhD (last known address: 30 N Michigan Ave, Ste 1126, Chicago) may testify to unprivileged conversations with Plaintiff Marilyn Mulero, his role as a Clinical Psychologist, and any other information he may have related to the facts alleged in Plaintiffs' Complaints.
67. Elizabeth Bermudez (address unknown) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations following these crimes.
68. Jack Smeeton (1187 Wilmette Avenue, #320, Wilmette, Illinois) may testify as to unprivileged conversations with Plaintiff Mendoza, his role as her attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.
69. Plaintiffs' criminal defense and/or appellate and/or post-conviction attorneys (names and addresses unknown at this time) may testify as to unprivileged conversations with Plaintiffs, their roles as Plaintiffs' attorneys, and any other information they may have related to the facts alleged in Plaintiffs' Complaints and Plaintiffs' criminal cases.
70. Chicago Police Department record keepers, to lay the foundation for any police reports or documents.
71. DJ UGO CRAZY of the DJ UTV Podcast (address unknown) may testify regarding their knowledge of the events of May 12, 1992, and their communications with Jacqueline Montanez, including those that occurred before, during, and after the recording of their podcast episode.
72. Ayatollah Marv of the Ayatollah Marav Talks Podcast (address unknown) may testify regarding their communications with Jacqueline Montanez, including those that occurred before, during and after the recording of their podcast episode.
73. Juju G of the Free Da Guys Podcast (address unknown) may testify regarding their communications with Jacqueline Montanez, including those that occurred before, during and after the recording of their podcast episode.
74. Miranda Jones of Pink Confinement Podcast (address unknown) may testify regarding her communications with Jacqueline Montanez, including those that occurred before during and after the recording of their podcast episode.
75. Donte of Tap N' podcast (address unknown) may testify regarding her communications with Jacqueline Montanez, including those that occurred before, during and after the recording of their podcast episode.
76. "Uncle Splif" of Splif TV (address unknown) may testify regarding his communications with Jacqueline Montanez, including those that occurred before, during and after the recording of their podcast episode.

77. Vladislav Lyubovny of VladTV (address unknown) may testify regarding his communications with Jacqueline Montanez, including those that occurred before, during and after the recording of their podcast episode.
78. Assistant State's Attorney Michael McCormick, to be contacted through the Cook County State's Attorney's Office, may testify regarding the allegations in Plaintiffs' Complaints, including but not limited to his 2005 interview of Jacqueline Montanez at Dwight Correctional Center.
79. Cook County State's Attorney's Office Investigator Callaway, to be contacted through the Cook County State's Attorney's Office, may testify regarding their participation in the 2005 interview of Jacqueline Montanez at Dwight Correctional Center, conducted by Assistant State's Attorney Michael McCormick.
80. County State's Attorney's Office Investigator Galvin, to be contacted through the Cook County State's Attorney's Office, may testify regarding their participation in the 2005 interview of Jacqueline Montanez at Dwight Correctional Center, conducted by Assistant State's Attorney Michael McCormick.
81. The Honorable Andrew H. Berman (Ret.) (address unknown) may testify regarding the criminal prosecution and his representation of Jacqueline Montanez for the murders of Hector Reyes and Jimmy Cruz, in *People v Jacqueline Montanez*, 92CR13088.
82. Justin Brooks, University of San Diego School of Law 5998 Alcala Park, San Diego, CA 92110, may testify regarding the post-conviction proceedings and his representation of Jacqueline Montanez for the murders of Hector Reyes and Jimmy Cruz.
83. Alison Flaum, Northwestern Pritzker School of Law Bluhm Legal Clinic 375 East Chicago Avenue, Chicago, IL 60611, may testify regarding *Miller* resentencing proceedings and her representation of Jacqueline Montanez.
84. Beth Polero (address unknown) may testify regarding her communications with Jacqueline Montanez including before, during and after her incarceration in 1994.
85. Father Jeremiah Lynch, St. Ignatius Jesuit Community, 1025 W Taylor Street, Chicago, IL 60607, may testify regarding the criminal prosecution and his representation of Marilyn Mulero for the murders of Hector Reyes and Jimmy Cruz, in *People v. Marilyn Mulero*, 93CR18998.
86. Former Assistant State's Attorney Eric Leafblad, to be contacted through the Cook County State's Attorney's Office, may testify regarding Jacqueline Montanez's resentencing proceeding.
87. Former Assistant State's Attorney Thomas Darman, to be contacted through the Cook County State's Attorney's Office, may testify regarding Jacqueline Montanez's resentencing proceeding.

88. Joseph Whitting Jr. (address unknown) may testify regarding Madeline Mendoza's organized gang-related activities, including recruitment and involvement in criminal operations during her time at the Cook County Jail.
89. Counselor Crunkovic, Illinois Department of Corrections, may have knowledge about communications with Plaintiff Mendoza while incarcerated.
90. Fernando Zayas, aka Prince Fernie, New Jersey Department of Corrections, may have knowledge about communications with Jacqueline Montanez while incarcerated.
91. Anna Rodriguez (address unknown) may testify regarding her knowledge of the events of May 12, 1992, involving the murders of Jimmy Cruz and Hector Reyes, as well as her conversations and observations prior to and following these crimes, including but not limited to during the police investigation.
92. Evidence Technician P. Salter (Star #13420), to be contacted through counsel for the City of Chicago, may testify regarding his involvement in the investigation of the incident that is the subject of this lawsuit, his training and experience as a police officer, and any reports he may have authored.
93. Former Assistant State's Attorney Michael Krejki, to be contacted through the Cook County State's Attorney's Office, may testify regarding the allegations in Plaintiffs' Complaints, including but not limited to any reports he authored or assisted in authoring, statements taken, his approval of felony charges in the murders of Jimmy Cruz and Hector Reyes, and his role as prosecuting attorney.
94. Former Assistant State's Attorney William Gamboney, to be contacted through the Cook County State's Attorney's Office, may testify regarding his roles as prosecuting attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints and Plaintiffs' criminal cases.
95. Former Public Defender Weiss may testify as to unprivileged conversations with Jaqueline Montanez, his role as her attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.
96. Former Public Defender Deborah Grohs may testify as to unprivileged conversations with Jaqueline Montanez, her role as her attorney, and any other information she may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.
97. Former Public Defender Allen Sincox may testify as to unprivileged conversations with Marilyn Mulero, his role as her attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.

98. Former Public Defender Robert Isaacson may testify as to unprivileged conversations with Marilyn Mulero, his role as her attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.

99. Former Public Defender Stuart Katz may testify as to unprivileged conversations with Marilyn Mulero, his role as her attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.

100. Former Assistant State's Attorney Bernard Murray, to be contacted through the Cook County State's Attorney's Office, may testify regarding his roles as prosecuting attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints and Plaintiffs' criminal cases.

101. Former Public Defender Susan Smith may testify as to unprivileged conversations with Marilyn Mulero, his role as her attorney, and any other information he may have related to the facts alleged in Plaintiffs' Complaints, Plaintiffs' criminal case, and other legal proceedings.

Investigation continues. These disclosures are not intended to be a final list of possible witnesses in this matter. Defendants reserve the right to supplement these disclosures during the course of their investigation. Defendants also reserve the right to call any witness disclosed by Plaintiffs at the trial of this matter.

Dated: January 8, 2024

Respectfully submitted,

/s/ Catherine M. Barber  
*One of the Attorneys for City of Chicago*

/s/ George J. Yamin Jr.  
*One of the Attorneys for Defendants Gawrys,  
Riccio, Biebel and Special Representative Yanow*

Special Assistant Corporation Counsel  
Rock Fusco & Connelly, LLC  
333 W. Wacker Drive, 19<sup>th</sup> Floor  
Chicago, IL 60606  
P: (312) 494-1000  
[cbarber@rfclaw.com](mailto:cbarber@rfclaw.com)

Special Assistant Corporation Counsel  
THE SOTOS LAW FIRM, P.C.  
141 W. Jackson Blvd, Suite 1240A  
Chicago, IL 60604  
P: (630) 735-3300  
[gyamin@jsotoslaw.com](mailto:gyamin@jsotoslaw.com)

/s/Andrea F. Checkai  
*One of the Attorneys for Reynaldo Guevara*

Special Assistant Corporation Counsel  
Borkan & Scahill, Ltd  
20 S. Clark Street, Suite 1700  
Chicago, IL 60603  
P: (312) 580-1030  
[acheckai@borkanscahill.com](mailto:acheckai@borkanscahill.com)