

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

Joseph Keeling, )  
 )  
 Plaintiff, )  
 )  
 -vs- ) No. 23-cv-3442  
 )  
 Sheriff of Lake County, Lake ) (Judge Seeger)  
 County, Illinois, and Lake County )  
 Correctional Officer S. Tyler, )  
 )  
 Defendants. )

# JOINT STATUS REPORT

The parties to this action submit the following status report in compliance with the Court's order of August 5, 2024 (ECF No. 31):

1. Plaintiff intends to offer an expert. Defendants will decide if they require an expert after reviewing any expert report served by plaintiff. Plaintiff, without objection from defendants, requests 90 days to serve his expert report.

2. Defendant intends to move for summary judgment following completion of expert discovery. At this point Defendants expect to raise plaintiff's failure to present a genuine issue on (1) a denial of "reasonable accommodation" under the ADA; and (2) the elements of his Section §1983 claim, including a showing of "objectively unreasonable" actions on the part

of defendants. Plaintiff is contemplating seeking to amend the complaint to delete his claims against Tyler.

3. There have not been any settlement discussions. The parties intend to revisit settlement after plaintiff has served his expert report.

Respectfully submitted,

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/s/ Melanie K. Nelson (with consent)  
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