

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

Michael Jones,)
)
 Plaintiff,) No. 23-cv-4975
)
 -vs-) Judge Alexakis
)
 City of Chicago, et al.,) Magistrate Judge Berry
)
 Defendants.)

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of November 19, 2025:

I. Discovery

Plaintiff and the City continue to work on discovery matters and are close to finalizing the few remaining issues regarding City records relating to Gang Enforcement Records. Plaintiff and the City have resolved a discovery issue relating to records of the Office of Emergency Management and Communication.

II. Settlement

The parties are in agreement that a settlement conference would be beneficial and respectfully request that the Court hold a conference before setting deadlines for expert discovery and dispositive motions.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
Counsel for Plaintiff

/s/ Breana Brill (by consent)
Shneur Z. Nathan
Avi Kamionski
Helen O'Shaughnessy
Breana Brill
Special Assistant Corporation Counsel
Nathan & Kamionski, LLP
206 S. Jefferson St.
Chicago, IL 60661
(312) 612-1702
bbrill@nklawllp.com
Counsel for Defendant City of Chicago

/s/ Whitney N. Hutchinson (by consent)
Timothy P. Scahill
Steve B. Borkan
Whitney N. Hutchinson
Borkan & Scahill, Ltd.
20 S. Clark Street, Ste 1700
Chicago, IL 60603
(312) 580-1030
whutchinson@borkanscahill.com
Counsel for Defendant David Salgado

/s/ Larry S. Kowalczyk (by consent)
Larry S. Kowalczyk - Special Assistant Corporation
Counsel
Megan K. Monaghan - Special Assistant
Corporation Counsel
Mohan Groble Scolaro, P.C.
55 W. Monroe Street, Suite 1600
Chicago, Illinois 60603
312/422-9999
lkowalczyk@mohangroble.com
*Counsel for Defendants Officer Cox, Sgt. Theodore,
and Detective Pruger*

CERTIFICATE OF SERVICE

I, Breana Brill, an attorney, hereby certify that I caused the foregoing document to be filed with the Court's CM/ECF system, which provided electronic notice and a copy of the same to all counsel of record.

/s/ Breana Brill
Breana Brill