

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

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

**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