

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

JOINT STATUS REPORT

The parties, by counsel, submit this joint status report pursuant to the Court's Order of May 13, 2025:

All parties will have answered written discovery by June 24, 2025, and they will work together to schedule depositions before the close of fact discovery.

Defendant City of Chicago intends to issue the following subpoenas relating to Plaintiff's medical records for the agreed upon dates, March 31, 2015, through August 21, 2017:

- Saint Anthony Hospital
- Cook County Jail
- Illinois Department of Corrections or Wexford
- Cook County Health and Hospital Systems or Cermak
- Shawnee Correctional Center
- Cook County Department of Corrections

Additionally, the City also intends to issue subpoenas to Cook County Jail, Illinois Department of Corrections, and Cook County Department of Corrections for records stemming from Plaintiff's prior incarcerations that predate this incident as well as Minnesota Department of Corrections for Plaintiff's medical records stemming from August 22, 2017, to the present day, to preserve its request, but will request the entities not produce those records as the parties disagree on the accessibility of Plaintiff's health records from that time period. The parties intend to review the agreed upon records to inform discussions regarding the disputed time-frames.

The City also successfully unsealed Plaintiff's expunged records but is still awaiting the records from Cook County State's Attorney's Office ("CCSAO") and the Circuit Court. The City intends to follow up with those entities and will issue a subpoena for the records, if necessary.

Plaintiff's counsel has a conflict on June 24, 2025, at 11:00 a.m., when the next status hearing is scheduled, and plaintiff's counsel respectfully requests that the Court reschedule the hearing. The parties are available at 10:00 a.m. on June 24, 2025, or on June 26, 2025 or June 27, 2025.

Respectfully submitted,

[signatures begin on following page]

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