

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

# REPORT OF PARTIES' PLANNING MEETING

The parties, by counsel, file the following report of planning meeting:

## 1. Meeting

Pursuant to FED. R. CIV. P. 26(f), counsel listed below corresponded by email on January 30, 2024:

Joel Flaxman for plaintiff

Manasseh Konadu for defendant

## 2. Nature of the Case

a. Plaintiff Tariq Anderson claims that he was deprived of rights secured by the Eighth Amendment to the Constitution of the United States when defendant Humerto Lozano, a correctional officer, subjected him to excessive force. Defendant denies all alleged wrongdoing.

b. Federal question jurisdiction is based on 28 U.S.C. § 1333 because plaintiffs brings federal claims under 42 U.S.C. § 1983.

### **3. Pre-trial Schedule**

The parties jointly propose to the Court the following discovery plan:

- a. Discovery will be needed on the following subjects: facts surrounding the alleged use of force and any internal investigation about the incident.
- b. Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) to be made by 2/21/24. All discovery to be commenced in time to be completed by 6/7/24.
- c. The parties do not anticipate any ESI issues.
- d. The parties expect they will need no more than 5 depositions.
- e. The parties do not anticipate the need for expert discovery.
- f. All potentially dispositive motions should be filed by 7/8/24.

### **4. Trial Schedule**

- a. The parties propose that the Court set a status hearing shortly after the close of discovery to set further deadlines.
- b. The parties estimate that trial will last 2 days.

### **5. Expected Evidentiary Proceedings**

The parties anticipate there may be the following types of evidentiary hearings: pre-trial motions in limine and a jury trial.

### **6. Settlement**

Plaintiff will make a written settlement demand by 2/7/24.

**7. Consent**

The parties do not consent unanimously to proceed before a magistrate judge.

Respectfully submitted,

/s/ Joel A. Flaxman  
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