

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

Maurice Delphi,)	
)	
<i>Plaintiff,</i>)	
)	No. 23-cv-14864
<i>-vs-</i>)	
)	<i>(Judge Kness)</i>
City of Chicago, Ronald Watts, Brian)	
Bolton, Robert Gonzalez, Alvin)	
Jones, Kallatt Mohammed, Calvin)	
Ridgell, and Michael Spaargaren,)	
)	
)	
<i>Defendants.</i>)	

MOTION TO POSTPONE INITIAL STATUS HEARING

Plaintiff, by counsel, respectfully requests that the Court postpone the initial status hearing by 28 days (from January 4, 2024 to February 1, 2024) because defense counsel has not yet received authority to waive service and appear. Grounds for this motion are as follows:

1. This case is part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, a group of more than 170 cases that are coordinated for pretrial proceedings.
2. The coordinated proceedings are assigned to Judge Valderrama, and Magistrate Judge Finnegan is supervising discovery.
3. The current status of the coordinated proceedings is that the parties are focused on litigating 19 “test cases” to their conclusion to help the parties assess the value and merit of the remaining cases.

4. This case is not one of the test cases. Discovery in this case and other cases that are not test cases is stayed.

5. On October 13, 2023, plaintiff's undersigned counsel sent requests to waive service to the attorneys who have appeared for the defendants in every other case that is part of the coordinated proceedings.

6. On December 19, 2023, defense counsel informed undersigned counsel that they are awaiting authorization from the City of Chicago to waive service and appear for their clients. Accordingly, plaintiff is unable to obtain defendants' position on this motion.

7. To allow defense counsel time to receive authorization from the City of Chicago to waive service and appear for their clients, plaintiff respectfully requests that the Court postpone the initial status hearing by 28 days to February 1, 2023.

Respectfully submitted,

/s/ Joel A. Flaxman
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