

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN MARTINEZ,)
Plaintiff,) Case No. 23 CV 1741
v.) Honorable Judge Georgia N. Alexakis
RENALDO GUEVARA, et al.) Hon. Magistrate Judge Laura K. McNally
Defendants.)
JURY TRIAL DEMANDED

JOSE TINAJERO,)
Plaintiff,) Case No. 24 CV 1598
v.) Honorable Judge Georgia N. Alexakis
CITY OF CHICAGO, et al.) Hon. Magistrate Judge Laura K. McNally
Defendants.)
JURY TRIAL DEMANDED

THOMAS KELLY,)
Plaintiff,) Case No. 24 CV 05354
v.) Honorable Judge Georgia N. Alexakis
RENALDO GUEVARA, et al.) Hon. Magistrate Judge Laura K. McNally
Defendants.)
JURY TRIAL DEMANDED

JOINT STATUS REPORT

The Parties, by their respective undersigned counsel, and pursuant to this Court's Order of September 8, 2025, submit the following joint status report for the three above-captioned cases:

A. Progress of Discovery

The parties conducted a Rule 30(b)(6) deposition of defendant City of Chicago in multiple pending *Guevara* cases, including these three, on October 15, 2025. The parties continue to confer by agreement about certain topics of testimony relating to the Rule 30(b)(6) deposition.

The City of Chicago owes Plaintiffs responses to *Monell* interrogatories, and the parties agree that the City will provide responses on or before December 16, 2025.

The parties made expert disclosures on November 26, 2025. Pursuant to the Court's Order of November 19, 2025, rebuttal disclosures are due on January 21, 2026, and expert discovery is to be completed by February 27, 2026.

B. Settlement

The City Defendants have not received a settlement demand from Plaintiffs. The Cook County Defendants and Plaintiffs Martinez and Kelly have settled and those claims have been dismissed. Defendant Cook County responded to Plaintiff Tinajero's initial settlement demand on January 6, 2025 with an initial offer. Plaintiff Tinajero responded on January 8, 2025 with a counter. Cook County has not responded to Plaintiff Tinajero's counter.

Respectfully Submitted,

[signatures on following page]

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