

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

JOINT STATUS REPORT

The parties submit this joint status report in compliance with the Court's order of August 21, 2024:

1. Defendant served his set of written discovery to Plaintiff on August 22, 2024. The Court entered a HIPAA Order and defendants have ordered what they believe to be the relevant medical records. The parties jointly request that the Court readjust the pre-trial schedule to allow another 21 days (to October 4, 2024) for the parties to complete written discovery.

2. Good cause sufficient for altering discovery deadlines is demonstrated when a party shows that, "despite their diligence, the established timetable could not be met." *Adams v. Northern Indiana Public Service Co.*, No. 2:10-cv-469, 2015 U.S. Dist. LEXIS 103544, at *2 (N.D. Ind. Aug. 7, 2015). Here, while Plaintiff was able to issue written discovery to allow for responses by September 13, 2024, defense counsel was required by her employer, the Office of the State's Attorney of Cook County, needed additional time to receive approval from

Defendant Sheriff Dart regarding the content of his written discovery that would be issued to Plaintiff.

3. The parties therefore jointly respectfully request the Court to extend to October 4, 2024, the time for the parties to complete written discovery.

4. The parties have identified witnesses they wish to depose and will be able to complete depositions by October 28, 2024.

5. The request for an extension is made in good faith and not to delay or prejudice the Plaintiff. Rather, it is to allow time for each party to answer written discovery and obtain responsive documents including medical records from all of Plaintiff's treaters.

Respectfully submitted,

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