

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

JOINT STATUS REPORT

The parties, by counsel, submit the following joint status report pursuant to the Court's order of January 2, 2025:

1. Progress of discovery

The parties have answered written discovery. Defendants have issued a Rule 37 letter to Plaintiff regarding Plaintiff's discovery responses, Plaintiff has responded to the letter, and the parties are attempting to resolve those issues. Once those issues are resolved, the parties will schedule the depositions of plaintiff and defendant Agredano.

2. Details regarding settlement discussions

Plaintiff served defendants with a settlement demand on August 12, 2024. Defendants have informed the plaintiff that Defendants will respond to Plaintiff's demand after Plaintiff is deposed. [See Dkt. 21].

Respectfully submitted,

[Signatures on following page]

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
jaf@kenlaw.com
attorneys for plaintiff

/s/ Brian P. Gainer (by consent)
Brian P. Gainer
Lisa M. McElroy
Jack A. Gainer
Johnson & Bell, Ltd.
33 West Monroe St., Ste 2700
Chicago, IL 60603
(312) 372-0770
attorneys for defendants