

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

Randy Johnson, Jonathan Shields,)
and Germain Sims,)
)
Plaintiffs,) No. 25-cv-1094
)
-vs-) (*Judge Shah*)
)
Baker Alfarajat #18414, Charles)
Flaster #15498, John Sandoval)
#1079, Ronson Solaqa #7973, and)
City of Chicago,)
)
Defendants.)

JOINT STATUS REPORT

The parties, by counsel, submit this status report pursuant to the Court's Order of October 29, 2026:

The parties have completed the depositions of the three plaintiffs, defendant Flaster, defendant Sandoval, and two third-party witnesses. Depositions of Defendants Alfarajat and Solaqa are scheduled for tomorrow, December 16, 2025.

The parties also seek to depose Jordan Fracassi, a third-party witness employed by former-defendant Dick's Sporting Goods. Defense counsel was cooperating with counsel for Dick's to schedule this deposition, but counsel for Dick's has been unable to produce Fracassi. Defense counsel intends, subject to court approval and without objection by plaintiff, to serve Fracassi with a subpoena to sit for a deposition.

Defendants served the Cook County State's Attorney's Office with a records subpoena on October 17, 2025 and a deposition subpoena on December 3, 2025. The State's Attorney's Office intends to file a motion to quash.

The parties respectfully request that the court extend the fact discovery deadline by 28 days to January 19, 2025, to allow the parties to depose Mr. Fracassi.

Respectfully submitted,

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