

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

| | | |
|-------------------------|---|-----------------|
| ANABEL K. MELONGO, |) | |
| |) | |
| Plaintiff, |) | 13 C 4924 |
| |) | |
| vs. |) | Honorable Judge |
| |) | John Z. Lee |
| ROBERT PODLASEK, et al. |) | |
| |) | |
| Defendants. |) | |

PROPOSED DISCOVERY STATUS

Now come the parties, by their attorneys, having conferred on December 2, 2015, pursuant to this Court's order of November 4, 2015, and submit the following proposed discovery status as follows:

1. The general type of discovery needed;

The parties expect written, oral, and expert discovery.

2. A date for Rule 26(a)(1) disclosures;

Parties have previously issued Rule 26 disclosures. Plaintiff's counsel has not received the file from previous counsel and therefore is not able to anticipate whether amendments or supplements are necessary.

3. A date to issue written discovery

Defendants issued written discovery. Plaintiff's counsel has not received the file from previous counsel and is not able to estimate the necessity of written discovery.

4. A date for the deadline for the amendment of pleadings (90 days after Rule 26(a) disclosures are exchanged).

According to the previous discovery schedule, December 4, 2015.

5. A fact discovery completion date

Plaintiff's counsel has not received the file from previous counsel and does not have a proposed estimate for fact discovery closure. Defendants note that Plaintiff's previous Rule 26 disclosures included around 70 witnesses.

6. An expert discovery completion date, including dates for the delivery of expert reports

Plaintiff's counsel has not received the file from previous counsel and is not able to

estimate the necessity or realms of expert discovery at this time.

7. A date for the filing of dispositive motions

If the current discovery timelines remain, Defendants would be able to file their dispositive motions within 30 days of fact discovery close.

With respect to trial

1. Whether a jury trial is requested

A jury trial is requested.

2. The probable length of trial.

7-10 days

Consent to Proceed Before a Magistrate Judge

There is not consent to proceed before the magistrate at this point.

Status of Settlement Discussions

A. Indicate whether any settlement discussions have occurred;

None

B. Describe the status of any settlement discussions;

None

C. Whether the parties request a settlement conference.

The parties do not request a settlement conference at this time.

Respectfully submitted,

By:

/s/ Martin Syvertsen

Martin Syvertsen

Assistant State's Attorney

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

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| ANNABEL MELONGO, |) | |
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| Defendant(s). |) | |

NOTICE OF FILING

TO: All Counsel of Record

PLEASE TAKE NOTICE that on December 2, 2015, Defendants filed the Discovery Status with the Clerk of the United States District Court, for the Northern District of Illinois, Eastern Division. The document has been linked to this notice via Electronic Case Filing (ECF).

ANITA ALVAREZ
State's Attorney of Cook County

By: /s/ Martin Syvertsen
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CERTIFICATE OF SERVICE

I, Martin Syvertsen, Assistant State's Attorney, hereby certify that on December 2, 2015, I filed the Proposed Discovery Status and that all counsel of record were served via Electronic Case Filing (ECF).

/s/ Martin Syvertsen