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Rule 16b Planning Conference Report Format**United States District Court**For The Northern District of Illinois
Eastern Division**FILED**MAR 31 2008
MAR 31 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Plaintiff

Jerome Tate

-V-

City of Chicago et al

Defendant

Case Number:

08 C 218

Judge:

Coar

REPORT OF PARTIES' PLANNING CONFERENCEPursuant to this court's order, Nery Toppe representing plaintiff(s), and Robert Rutherford
representing the defendant(s), met on 3/31/08 pursuant to Rule 26(f) to discuss:

- (1) the nature and basis of their claims and defenses;
- (2) the possibilities for a prompt settlement or resolution of this case;
- (3) to make or arrange for the disclosures required under Rule 26(a)(1); and
- (4) to develop a discovery plan.

To that end, the parties propose the following:

A. The issues in this case may be simplified by taking the following steps:

1. Entry of protective order covering Plaintiff's medical records.
2. Entry of protective order covering OPS CTR.
- 3.
- 4.
- 5.

B. The following modifications to the discovery requirements of the Federal Rules of Civil Procedure or Local Rules should be made in order to expedite discovery:

- 1.

- 2.
- 3.
- 4.
- 5.

C. Discovery will be needed on the following subjects:

1. Excessive force
2. City Policy + Procedures on investigation + discipline excessive force
3. Plaintiff's medical condition + treatment
- 4.
- 5.

D. Discovery should/should not be conducted in phases.

Refute Monell discovery.

E. Discovery is likely to be contentious and management of discovery should be referred to the Magistrate Judge. Yes _____ No ☒

F. The parties consent do not consent to this matter being referred to the Magistrate Judge for final disposition.

G. The parties have discussed the possibility of alternative dispute resolution and concluded:

Not at this time.

H. The parties have discussed a prompt settlement or other resolution of this matter. The plaintiff has made a written demand of \$ None at this time, and the defendant has offered \$ None at this time.

I. The Court should consider the following methods of expediting the resolution of this matter:

[Signature]
Attorney for Plaintiff

[Signature]
Attorney for Defendant

25/3/08