

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

CORY JACKSON,)
)
Plaintiff,)
)
v.)
)
THE CITY OF URBANA, ILLINOIS,)
a municipal corporation, THE CITY OF)
CHAMPAIGN, ILLINOIS, a municipal)
corporation, JEFFREY STEINBERG,)
DUANE SMITH, MATTHEW BAIN,)
ELIZABETH ALFONSO, DAVE ROESCH,)
MICHAEL CERVANTES, JAMES KERNER,)
MATTHEW QUINLEY, JAY LOSCHEN,)
DAVE GRIFFET, and UNKNOWN)
EMPLOYEES OF THE CITY OF URBANA,)
)
Defendants.)

Case No. 20-cv-2054
Magistrate Judge Eric I. Long
JURY TRIAL DEMANDED

**JOINT REPORT OF RULE 26(f) PLANNING MEETING &
PROPOSED DISCOVERY PLAN**

Plaintiff Cory Jackson (“Plaintiff”), being represented by Nathan & Kamionski LLP, Defendants the City of Champaign, Illinois and Champaign Police Sergeant Dave Griffet (“Champaign Defendants”), being represented by Thomas Mamer LLP, and Defendants the City of Urbana, Illinois, Jeffrey Steinberg, Duane Smith, Matthew Bain, Elizabeth Alfonso, Dave Roesch, Michael Cervantes, James Kerner, Matthew Quinlay, and Jay Losche (“Urbana Defendants”), being represented by Knight, Hoppe, Kurnik & Knight, Ltd., hereby submit the following report of the parties’ Rule 26(f) planning meeting:

1. On April 22, 2020, counsel conferred for the purpose of formulating a proposed discovery plan for consideration by the Court. Plaintiff was represented by Natalie Adeeyo of Nathan & Kamionski LLP. Defendants the City of Champaign, Illinois and Champaign Police

Sergeant Dave Griffet were represented by Justin Brunner and David E. Krchak of Thomas Mamer LLP. Defendants the City of Urbana, Illinois, Jeffrey Steinberg, Duane Smith, Matthew Bain, Elizabeth Alfonso, Dave Roesch, Michael Cervantes, James Kerner, Matthew Quinlay, and Jay Losche were represented by William Kurnik of Knight, Hoppe, Kurnik & Knight, Ltd.

2. The following are dates upon which counsel has agreed:

3. By May 29, 2020, each party must serve its Fed. R. Civ. P. 26(a)(1) initial disclosures.

4. Plaintiff and Urbana Defendants may start seeking written discovery (e.g. serve interrogatories) from each other immediately. Otherwise, each party may start seeking discovery (e.g. serve interrogatories) within seven (7) days of the following date (rather than at another time provided by Fed. R. Civ. P. 26(d)(1)):

a. the date of any order that wholly grants Defendants Michael Cervantes, James Kerner, Jay Loschen, and Dave Roesch's Motion to Dismiss (Doc. 26) and Defendants City of Champaign and Dave Griffet's Motion to Dismiss (Doc. 28) without granting Plaintiff leave to file an amended complaint; or

b. the date when all Defendants have filed answers to any amended complaint that Plaintiff is allowed to file in an order otherwise granting the motion to dismiss; or

c. the date of any order that wholly denies the motion to dismiss.

5. Fact discovery shall close by September 30, 2021.

6. Deadline for amendment of pleadings and joinder of additional parties is August 31, 2021.

7. Plaintiff shall disclose experts and provide expert reports by November 1, 2021, and such experts shall be made available for depositions by November 30, 2021.

8. Defendants shall disclose experts and provide expert reports by January 7, 2022, and such experts shall be made available for depositions by January 31, 2022.
9. Rebuttal experts, if any, shall be disclosed by February 28, 2022, and depositions of rebuttal experts shall be completed by March 31, 2022.
10. The deadline for filing case dispositive motions shall be May 16, 2022.
11. No further discovery shall be conducted after the conclusion of rebuttal expert discovery.
12. The parties estimate that the jury trial will take six to eight days.
13. The matters outlined in this proposed discovery plan are not meant to prevent any party from subsequently seeking differing or additional relief of these issues.

Respectfully submitted,

/s/ Natalie Y. Adeeyo

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CERTIFICATE OF SERVICE

I, Natalie Y. Adeeyo, an attorney, hereby certify that on the date stamped on the above margin, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Natalie Y. Adeeyo
Natalie Y. Adeeyo