

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

CHICAGOANS FOR AN END TO THE)	
GANG DATABASE, et. al.,)	
)	
Plaintiffs,)	Case No. 18-CV-4242
)	
v.)	Hon. Andrea R. Wood
)	
CITY OF CHICAGO, et. al.,)	
)	
Defendants.)	

JOINT MOTION TO STAY LITIGATION

The Parties jointly move this Court to allow this litigation to be stayed for 120 days in order for the Parties to evaluate how the matters identified below may affect this litigation. In further support of this motion, the Parties state as follows:

1. The Plaintiffs filed this action on behalf of a putative class, six organizational plaintiffs and four individual plaintiffs seeking *inter alia* detailed injunctive relief to remedy their allegations that the Chicago Police Department's ("CPD") policies and practices related to designating individuals as gang members violate the U.S. Constitution and related statutes.

2. Currently the Parties are in the midst of briefing the Defendants' Motion to Dismiss (Doc. No. 35). Defendants' reply brief was due April 12, 2019, and Defendants have a pending motion for an extension regarding that date. Discovery in this matter has been stayed pending the Court's resolution of the motion to dismiss.

3. Over the past year, the City of Chicago's Office of the Inspector General ("OIG"), through its Deputy for Public Safety, conducted an audit of "CPD standards and practices for determining gang affiliation and the consequences of being identified as gang affiliated." See City of Chicago Office of the Deputy Inspector General for Public Safety Releases Initiated

Projects Lists, Mar. 22, 2018, <https://igchicago.org/2018/03/22/city-of-chicago-office-of-the-deputy-inspector-general-for-public-safety-releases-initiated-projects-list/>.

4. Last week, on April 11, the OIG publicly released the results of the audit, as well as CPD's response to the audit. In addition, CPD has drafted a new policy regarding how it inputs and accesses information about criminal street gangs. CPD is currently taking public comments on the proposed policy through May 11, 2019, after which it will finalize the policy. See <https://home.chicagopolice.org/criminal-enterprise-database/>.

5. The Parties request this stay in order to evaluate how the OIG audit, the CPD's response thereto, and the CPD's anticipated new policy regarding gang membership information may affect the Parties' positions in this litigation.

6. As part of their evaluation of the various factors listed above, the Parties will communicate to determine whether settlement may be a possibility.

WHEREFORE, the Parties jointly request that this Court grant a stay of this litigation for 120 days.

Respectfully submitted,

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By: /s/ Vanessa del Valle

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that she filed the foregoing document via the Court's CM/ECF system, which will automatically provide notice to all parties, on April 17, 2019.

/s/ Vanessa del Valle