



DOCUMENTED NOTICE · TRANSMITTED THE DAY THE PRODUCTION WAS RECEIVED

ANSWER DUE AUGUST 10, 2026

Supplement — Lake County Production of July 29, 2026

Eldad Z. Malamuth, Assistant Attorney General · ARDC No. 6275421
Office of the Illinois Attorney General · 115 South LaSalle Street, Chicago, Illinois 60603
eldad.malamuth@ilag.gov · (312) 814-2235
cc: Katherine.Doersch@ilag.gov · Michael.Arnold@ilag.gov

MATTER**Allababidi v. Junkin, et al., No. 1:26-cv-01077 (N.D. Ill.) (Blakey, J.)**

Answer extended to August 10, 2026 (Dkt. 45) · appearance filed July 28, 2026 (Dkt. 50) · supplement built on the Lake County production of July 29, 2026

Counsel:

This supplements the notice transmitted to you on July 28, 2026. On July 29, 2026 Lake County produced 805 pages of internal electronic mail concerning the petitioner. Several of those pages are correspondence between Lake County and your office about this case. They are identified below so that the answer due August 10, 2026 is prepared against them.

I. CORRESPONDENCE BETWEEN LAKE COUNTY AND YOUR OFFICE

Date	Page	What the page records
Jun 26, 2026	446, 548, 552	Michael Arnold of your office forwards to Katherine Doersch a message captioned “Q re probation/parole officers,” noting “[s]ee below from AOIC on the habeas issue.”
Jun 26, 2026	547	Dan E. Brown of the Lake County State’s Attorney’s Office corresponds with Ms. Doersch on “Allababidi, 26 C 1077 (N.D. Ill.).”
Jul 1, 2026	447	Request that your office represent Judge Christopher R. Stride and, separately, Junkin and Fontana — circulated with Chief Judge Daniel B. Shanes copied.
Jul 10, 2026	550, 551	Further correspondence between Mr. Brown and Ms. Doersch on the same matter.

PRODUCTION PAGE 446 — CHIEF LEGAL COUNSEL, ADMINISTRATIVE OFFICE OF THE ILLINOIS COURTS, JUNE 26, 2026

[“These are probation officers and the State (via the Supreme Court/AOIC) reimburses the County for their salaries. The request that AG representation should have come to you from either the AOIC or the Chief Judge’s Office (OCJ) ... If you got the request direct from the [officers] and not OCJ, I would tell the officers to submit their request to the OCJ first. Then OCJ can either submit the request to you direct or to me. **We just want to make sure the Chief Judge is aware of this.**”]

II. BEARING OF THESE PAGES ON THE ANSWER

The petition’s exhaustion posture turns in part on whether the State’s corrective process has been available. A verified motion for substitution of judge for cause under 725 ILCS 5/114-5(d) was file-stamped in Lake County No. 23 CF 1146 on **July 23, 2026**. The statute provides that upon filing, “a hearing shall be conducted as soon as possible after its filing by a judge not named in the motion.” No judge has been assigned to hear it and no order of referral appears on the docket.



The production establishes that the State had notice of that motion on the morning it was served. At 8:44 a.m. on June 18, 2026 the prosecuting Assistant State’s Attorney forwarded a notice reading “NEW FAX: A fax of 39 pages has been received on your fax” to county civil counsel. (Production p. 465.) A cause has since been set for August 6, 2026 at 9:00 a.m. before the judge the motion names.

The same production records, at 10:47 a.m. on June 17, 2026, the prosecuting assistant forwarding the petitioner’s message captioned “EMERGENCY — 23 CF 1146 — I APPEARED at the 9:...” to county civil counsel. (Production p. 299.) The order activating the 180-day term was entered at 2:50 p.m. that afternoon.

III. REQUESTS

- 1 That the pages identified above be reviewed before the August 10, 2026 answer is filed.
- 2 That any representation concerning the availability or adequacy of state corrective process account for the section 114-5(d) motion file-stamped July 23, 2026 and the absence of any order of referral on it.
- 3 That your office preserve its correspondence with Lake County, the Administrative Office of the Illinois Courts, and the Office of the Chief Judge concerning this matter and the representation requests identified above.

This letter makes no request that you decline to appear, and asserts no claim against you. Its only function is to fix the date on which the matters above became known, so that the answer is prepared with them in view.

THE ANSWER IS DUE AUGUST 10, 2026

The pages identified are in your client’s own production and are available to you from it. Reply, if you wish, by electronic mail to the address on this letterhead.

Respectfully and without waiver of any right or remedy,

/s/ Ehab Allababidi

EHAB ALLABABIDI | *Pro Se*

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com



EHAB ALLABABIDI

LEGAL CORRESPONDENCE

Supplement to the notice of July 28, 2026 · Ill. R. Prof. Conduct 3.3 · Fed. R. Civ. P. 11(b)

8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com

July 29, 2026

ENCLOSURE REGISTER

EXHIBIT INDEX

The following authenticated records are transmitted with and incorporated into this letter.

EX.	RECORD	BATES / SOURCE
A	AOIC and Attorney General correspondence on the habeas matter June 26, 2026. "See below from AOIC on the habeas issue."	PROD-000446, 000547 – 000548
B	Requests for representation, circulated with the Chief Judge copied July 1, 2026, 10:44 a.m.	PROD-000447
C	Notice of the thirty-nine-page fax, June 18, 2026, 8:44 a.m. The fax carrying the section 114-5(d) motion.	PROD-000465
D	"I APPEARED at the 9:..." forwarded June 17, 2026, 10:47 a.m. The order activating the 180-day term was entered at 2:50 p.m. that day.	PROD-000299



A

AOIC and Attorney General correspondence on the habeas matter

PROD-000446, 000547 – 000548

June 26, 2026. "See below from AOIC on the habeas issue."

Katherine M. Doersch
Chief, Criminal Appeals Division
Office of the Illinois Attorney General
Mobile: (773) 690-7078
Email: kathleen.doersch@iag.state.il.us
119 South LaSalle Street
Chicago, Illinois 60603

From: Arnold, Michael <Michael.Arnold@iag.state.il.us>
Sent: Friday, June 26, 2026 12:23 PM
To: Doersch, Katherine <Katherine.Doersch@iag.state.il.us>
Cc: Laurent, Katherine <Katherine.Laurent@iag.state.il.us>; Fletcher, Christopher <Christopher.Fletcher@iag.state.il.us>
Subject: FW: Q re probation/parole officers

See below from AOC on the habeas issue

From: Katherine Murphy <kmurphy@illinoiscourts.gov>
Sent: Friday, June 26, 2026 12:12 PM
To: Arnold, Michael <Michael.Arnold@iag.state.il.us>
Subject: EXTERNAL: Re: Q re probation/parole officers

-- Mike

These are probation officers and the State via the Supreme Court/AOC (it reimburses the County for their salaries - The request for AG representation should have come to you from either the AOC or the Chief Judge's Office (CJL). If there are ok because probation officers are County employees) If you got the request directly from the officers and not CJL, I would tell the officers to submit their request to the CJL first. Then CJL can either submit the request to you directly or to me. We just want to make sure the Chief Judge is aware of this case. Let me know if you have any questions. Thanks

Sincerely

Kate Murphy
Chief Legal Counsel

From: Dan E. Brown
To: Matthew T. Junkin; Margaret K. Fontana
Cc: Colin Commito; Melanie Nelson
Subject: Fw: [EXTERNAL] Allababidi, 26 C 1077 (N.D. Ill.)
Date: Friday, June 26, 2026 1:23:36 PM
Attachments: Outlook-kbxqawlc.png

Matt and Meg,

This involves who will represent you in this case. Please look into it. There is a filing due on 7/10/26 for whomever ends up representing you. I think it starts with you informing the chief judge.

Per AOIC email below, the named respondents (Junkin and Fontana) should submit a request for representation to the Office of the Chief Judge (Lake County). OCJ, in turn, can then submit request directly to me or to Katie Murphy at the AOIC.

Dan Brown

From: Dan E. Brown <DBrown2@lakecountyil.gov>
Sent: Friday, June 26, 2026 1:19 PM
To: Doersch, Katherine <Katherine.Doersch@ilag.gov>
Subject: Re: [EXTERNAL] Allababidi, 26 C 1077 (N.D. Ill.)

I will.

From: Doersch, Katherine <Katherine.Doersch@ilag.gov>
Sent: Friday, June 26, 2026 1:16 PM
To: Dan E. Brown <dbrown2@lakecountyil.gov>; Colin Commito <ccommito@lakecountyil.gov>
Subject: [EXTERNAL] Allababidi, 26 C 1077 (N.D. Ill.)

CAUTION: Do not click links, open attachments, or reply to unknown or unexpected senders.
--

Hello,

Circling back on the Allababidi representation.

Per AOIC email below, the named respondents (Junkin and Fontana) should submit a

request for representation to the Office of the Chief Judge (Lake County).
OCJ, in turn, can then submit request directly to me or to Katie Murphy at the AOIC.

Would you be able to convey that information to Matt Junkin and Margaret Fontana or send me their email addresses so I can do so? I don't have their contact information.

Thank you,



Katherine M. Doersch
Chief, Criminal Appeals Division
Office of the Illinois Attorney General
Mobile: [REDACTED]
Email: katherine.doersch@ilag.gov
115 South LaSalle Street
Chicago, Illinois 60603

From: Arnold, Michael <Michael.Arnold@ilag.gov>
Sent: Friday, June 26, 2026 12:23 PM
To: Doersch, Katherine <Katherine.Doersch@ilag.gov>
Cc: Laurent, Katherine <Katherine.Laurent@ilag.gov>; Fletcher, Christopher <Christopher.Fletcher@ilag.gov>
Subject: FW: Q re probation/parole officers

See below from AOIC on the habeas issue.

From: Katherine Murphy <kmurphy@IllinoisCourts.gov>
Sent: Friday, June 26, 2026 12:12 PM
To: Arnold, Michael <Michael.Arnold@ilag.gov>
Subject: EXTERNAL: Re: Q re probation/parole officers

Hi Mike,



B

**Requests for representation, circulated with the Chief Judge
copied**

PROD-000447

July 1, 2026, 10:44 a.m.

From: [Maria Pellegrino](#)
To: [Bieszczak, Frank](#); [Griffis, Carson](#)
Cc: [Katherine Murphy](#); [Gabriela Zavala](#); [Lorena E. Hernandez](#); [Daniel B. Shanes](#); [Karl Walldorf](#)
Subject: [EXTERNAL] Reqs. for Representation –Allababidi v. Hon. Christopher R. Stride (Ill. Sup. Ct. 133301 (Mot for Sup. Order)); Allababidi v. Junkin/Fontana (7th Circ Case No. PDG)
Date: Wednesday, July 1, 2026 10:44:25 AM
Attachments: [Allababidi v. Hon. C. Stride \(Ill. Sup. Ct. 133301 Mot for Sup Order\).pdf](#)
[AG Representation Request for Judge Stride-Meg Fontana-Matthew Junkin.pdf](#)
[EMERGENCY MOTION INJUNCTION PENDING APPEAL 05272026.pdf](#)
[EMERGENCY PETITION WRIT MANDAMUS 05272026.pdf](#)
[NOTICE OF INTERLOCUTORY APPEAL 05272026.pdf](#)

CAUTION: Do not click links, open attachments, or reply to unknown or unexpected senders.

Good morning,

Req. for Representation –Allababidi v. Hon. Christopher R. Stride (Ill. Sup. Ct. 133301 (Mot for Sup. Order)

Please see the attached request for representation and case documents (some saved here; larger files are available in link provided in request letter). Please consider this our formal request that the Office of the Attorney General provide legal representation to the Judge Christopher R. Stride.

Our office would appreciate being notified of the Assistant Attorney General assigned to the case and of the ultimate disposition of the matter. Please be advised that the AOIC must be included in settlement negotiations, if any.

Req. for Representation – Allababidi v. Junkin/Fontana (7th Circ. Case No. PDG)

In addition, please see the attached request for representation and case documents related to actions naming probation department employees in a 7th Circuit appeal of Northern District case number 1:26-cv-01077. Please consider this our formal request that the Office of the Attorney General provide legal representation to:

- Margaret K. Fontana, Director, Division of Adult Probation Services, 19th Judicial Circuit and
- Matt Junkin, Adult Probation Officer, Lake County

Our office would appreciate being notified of the Assistant Attorney General assigned to the case and of the ultimate disposition of the matter. Please be advised that the AOIC must be included in settlement negotiations, if any. This request does not indicate an agreement by the AOIC to pay costs or damages related to this matter.



C

Notice of the thirty-nine-page fax, June 18, 2026, 8:44 a.m.

PROD-000465

The fax carrying the section 114-5(d) motion.

Taniell Starks

From: Nicholas Shepherd
Sent: Thursday, June 18, 2026 8:44 AM
To: Dan E. Brown
Cc: Benjamin Dillon
Subject: Fw: NEW FAX: A fax of 39 pages has been received on your fax number: +18473600993 from +17739200030 on 2026/06/18 04:22:59.
Attachments: ct18473600993-20260618022259001-136-1.pdf

Best,
Nick

Get Outlook for iOS

From: LCSAOfloor3Fax <LCSAOfloor3Fax@lakecountyil.gov>
Sent: Thursday, 18 June 2026 08:35:18
To: Nicholas Shepherd <NShepherd@lakecountyil.gov>
Subject: FW: NEW FAX: A fax of 39 pages has been received on your fax number: +18473600993 from +17739200030 on 2026/06/18 04:22:59.

This came into the fax number

From: Concord Fax <messaging@concordfax.com>
Sent: Thursday, June 18, 2026 5:09 AM
To: LCSAOfloor3Fax <LCSAOfloor3Fax@lakecountyil.gov>
Subject: NEW FAX: A fax of 39 pages has been received on your fax number: +18473600993 from +17739200030 on 2026/06/18 04:22:59.



New Fax

A fax of 39 pages has been received on 2026/06/18 04:22:59 at your Concord Fax Online fax number (+18473600993) and has been attached to this email.

Tracking Number: ct18473600993-20260618022259001-136-1
Received from (CSID): +17739200030



D

**"I APPEARED at the 9:..." forwarded June 17, 2026, 10:47
a.m.**

PROD-000299

The order activating the 180-day term was entered at 2:50 p.m. that day.

From: [Nicholas Shepherd](#)
To: [Dan E. Brown](#)
Subject: FW: [EXTERNAL] EMERGENCY — 23 CF 1146 — I APPEARED at the 9:00 a.m. remote call and was left in the Zoom waiting room; DEMAND to RECALL the zero-bond warrant (appearance made)
Date: Wednesday, June 17, 2026 10:47:38 AM
Attachments: [EA](#)
[EMERGENCY APPEARANCE DENIAL.pdf](#)

From: Ehab Hilfiger <defcon5ready@gmail.com>
Sent: Wednesday, June 17, 2026 10:30 AM
To: CT611 <CT611@lakecountyil.gov>; CT612 <CT612@lakecountyil.gov>; Courts <courts@lakecountyil.gov>; cccriminalfiling@lakecountyil.gov
Cc: Nicholas Shepherd <nshepherd@lakecountyil.gov>; Lake County State's Attorney <statesattorney@lakecountyil.gov>; Bailey Russell <BRussell@lakecountyil.gov>; Gregory C. Ticsay <GTicsay@lakecountyil.gov>; information@iardc.org
Subject: [EXTERNAL] EMERGENCY — 23 CF 1146 — I APPEARED at the 9:00 a.m. remote call and was left in the Zoom waiting room; DEMAND to RECALL the zero-bond warrant (appearance made)

CAUTION: Do not click links, open attachments, or reply to unknown or unexpected senders.
--

To the Office of the Chief Judge (Hon. Daniel B. Shanes), Judge Stride's courtroom, the Clerk, and the State:

EMERGENCY NOTICE: DEFENDANT PRESENT IN VIRTUAL WAITING ROOM

Case No: 23 CF 1146

Date: June 17, 2026

Current Time: 10:25 a.m.

This is an emergency notification sent while proceedings are in progress. I am the defendant in the above-referenced matter, appearing pro se.

I. RECORD OF APPEARANCE

A remote hearing was scheduled for today at 9:00 a.m. in Courtroom T-611. I joined the platform at 9:17 a.m. using the only available credentials (Dial-in: (312) 626-6799, Meeting ID: 835 2271 3472, Passcode: 206126).

As of 10:25 a.m., I remain in the virtual waiting room. The platform continues to display: "The host has joined. We've let them know you're here.". Despite being present and on time by the provided means, I have not been admitted or heard. Screenshots confirming my presence are attached.