



No. 2-26-0352

IN THE
APPELLATE COURT OF THE STATE OF ILLINOIS
SECOND JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,	)	Appeal from the Circuit Court
	)	of the 19th Judicial Circuit,
Plaintiff-Appellee,	)	Lake County, Illinois.
	)	
-vs-	)	No. 23 CF 1146
	)	
EHAB ALLABABIDI,	)	Honorable
	)	Christopher R. Stride,
Defendant-Appellant	)	Judge Presiding.

PARTIAL OBJECTION TO DEFENDANT’S MOTION TO MODIFY ORDER

The People of the State of Illinois, by Eric F. Rinehart, State’s Attorney of Lake County, Illinois, Edward R. Psenicka, Deputy Director, and Max C. Boose, Staff Attorney, State’s Attorneys Appellate Prosecutor, respectfully object in part to defendant’s Motion to Modify Order.

IN SUPPORT THEREOF, IT IS AVERRED THAT:

1. On July 28, 2026, defendant filed an “Omnibus Emergency Motion” and other filings with this Court, seeking among other matters for this Court to appoint appellate counsel. Def. Omnibus Em. Mtn. p. 1, 2. On July 31, 2026, this Court granted defendant’s “omnibus emergency motion” as to appointing the Office of the State Appellate Defender (“OSAD”), and ordered that defendant refrain from filing documents or contacting “communicate by any means with appellee’s counsel.”

2. Around this time period, defendant filed numerous *pro se* supplements and replies to the People’s filings while citing seven lawsuits he had filed to that point as “coordinated proceedings,” as well as belligerent direct communications to the People as shown by the exhibit attached to their objection to the motions regarding counsel, in which defendant identified at least two disciplinary

allegations he filed against Assistant State's Attorneys and asserted he would file further allegations alongside his "demand for withdrawal" Def. July 31, 2026, Letter, pp. 7-9; Def. 4th Supp., pp. 5, 9.

3. On August 7, 2026, this Court denied defendant's motions to remove OSAD from this case. This Court held that "the number and nature of appellant's filings make very clear that the appointment of counsel, which appellant again repeatedly requested, is necessary to maintain the integrity and efficiency of the appellate process."

4. On August 18, 2026, defendant filed a motion to modify order, requesting permission to "communicate with the Lake County State's Attorney's Office." Def. Mtn. Modify Order, p. 1. Defendant does not challenge the prohibition on direct contact with the office of the State's Attorneys Appellate Prosecutor, but requests modification to allow his contact with the Lake County State's Attorney's office for multiple reasons. Def. Mtn. Modify Order, p. 2. First, defendant cites that "the underlying case, Lake County Case Number 23 CF 1146, remains pending in the trial court" where defendant proceeds *pro se*. Def. Mtn. Modify Order, p. 3. Second, defendant cites pending federal litigation where defendant named a Lake County Assistant State's Attorney as a defendant. Def. Mtn. Modify Order, p. 3.

5. The People do not object to the motion to modify order, to the extent the order language stating defendant "shall not communicate by any means with appellee's counsel" encompassed defendant's ability to confer with the prosecutors litigating defendant's circuit court proceedings, but not regarding appellate proceedings. The People maintain that requiring defendant not to communicate with opposing appellate counsel while represented is prudent, and that forbidding defendant from threatening appellate court action or otherwise weaponizing these proceedings against officials in the circuit court is appropriate. Given that defendant is seeking tandem

proceedings for factual findings in relation to his sentence, as well as espousing that his seven pending cases are “coordinated,” there are well-founded concerns about defendant using one proceeding to pressure an outcome in another.

6. The People do not generally oppose defendant’s ability to litigate other matters as needed and appropriate, and therefore defer to the Court’s discretion on otherwise modifying the order. However, the People note that defendant has not established what contact is necessary for pending federal litigation, its current status, his representation status or lack thereof in those proceedings, or its intersection with the court’s order and the coordinated litigation described in the above paragraph.

WHEREFORE, for the foregoing reasons, the People of the State of Illinois respectfully request that this Court deny in part defendant’s Motion to Modify Order.

Respectfully submitted,

Eric F. Rinehart
State’s Attorney
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(847) 377-3000

Edward R. Psenicka
Deputy Director

By /s/ Max C. Boose
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STATE OF ILLINOIS)
) SS
COUNTY OF KANE)

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the above statements are true to the best of my knowledge and belief.

/s/ Max C.. Boose
Max C. Boose



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Jeffrey H. Kaplan, Clerk of the Court
APPELLATE COURT 2ND DISTRICT

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EHAB ALLABABIDI,	)	Honorable
	)	Christopher R. Stride,
Defendant-Appellant	)	Judge Presiding.

NOTICE AND PROOF OF SERVICE

TO: Christopher McCoy, Deputy Defender
Office of the State Appellate Defender
Second Judicial District
2nndistrict.eserve@osad.state.il.us

Under the penalties provided in law pursuant to Section 1-109 of the Code of Civil Procedure, I hereby certify that an partial objection to defendant's motion to modify order in the above-entitled cause is being electronically filed with the Clerk of the Appellate Court, Second District, on August 19, 2026. Upon acceptance of the filing from this Court, the party listed above will be served using the court's electronic filing system.

/s/ Sandra J. Lorigan
Sandra J. Lorigan, Legal Secretary
State's Attorneys Appellate Prosecutor
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