

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

PEOPLE OF THE STATE OF ILLINOIS, Plaintiff-Appellee, -vs- EHAB ALLABABIDI, Defendant-Appellant.	Appeal No. 2-26-0352 Appeal from the Circuit Court of the 19th Judicial Circuit, Lake County, Illinois Trial Court No. 23 CF 1146
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**DECLARATION OF EHAB ALLABABIDI REGARDING NOTICE, CHRONOLOGY, AND
AUGUST 23 COMMUNICATION**

I, Ehab Allababidi, state from personal knowledge:

1. On July 30, 2026, after receiving the People's verified objection signed and separately verified by Max C. Boose under 735 ILCS 5/1-109, I sent SAAP a written litigation-hold/correction notice. The notice quoted § 1-109, distinguished legal argument from factual certification, identified challenged representations, and requested correction by August 4.
 2. On August 5, 2026, Boose filed another personally verified objection. Paragraph 13 cited my July 30 notice by page, and the filing attached the complete July 30 notice as Exhibit 1. I rely on that filing to establish possession and use of the notice; I do not claim personal knowledge of what portions Boose subjectively read beyond what his filing cited or used.
 3. The August 7 order states, after discussing appointment of counsel and the volume/nature of filings: 'Accordingly, this court's order of July 31 will stand.' I have reviewed that order. It does not separately state that it 'referenced the bar on defendant communicating directly with the undersigned office.'
 4. On August 23, I sent a follow-up to SAAP and the Lake County State's Attorney and copied Christopher McCoy, Jaime Montgomery, and OSAD Second District. The email expressly stated: 'this is not a merits brief and asks no merits concession,' requested preservation/status information, and stated that silence would not be treated as agreement or admission.
 5. The People's August 25 sanctions motion, personally verified by Boose under § 1-109, states in paragraph 3: 'It further referenced the bar on defendant communicating directly with the undersigned office, holding that 'this court's order of July 31 will stand.' I have compared that sentence with the August 7 order identified above.
 6. I did not intend the August 23 communication to bypass appointed counsel. I understand that the Court's August 21 phrase 'appellee's appellate counsel' is being applied to SAAP in this appeal. I will send no further direct appellate communication to SAAP while that restriction remains operative and will route appellate communications through OSAD.
 7. No civil, disciplinary, or other action by me is conditioned on withdrawal of the sanctions motion. I preserve all lawful rights independently and offer no forbearance from reporting or litigation in exchange for any concession.
- Certification.** Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements above are true and correct to the best of my knowledge and belief.

Date: August 26, 2026

Signature: _____
 Ehab Allababidi