

REVIEW COPY - SELF-DIRECTED - NO RELIANCE ON OSAD OR SECOND DISTRICT
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TRANSMISSION AUTHORIZED

Independent Supervisory and Filing-Access Control Packet

Ehab Allababidi

Internal litigation-control review copy

8516 W. Winona St., Chicago, Illinois 60656

defcon5ready@gmail.com

MATTER**People v. Allababidi - Appeal No. 2-26-0352**

Forced counsel - personal filing blackout - clerk-side intake rejection - pending sanctions - appointed counsel refusal - independent supervisory vectors

Ehab:

This packet is a **review copy for self-directed litigation control**. It does not assume cooperation from the Office of the State Appellate Defender, the Second District Clerk, or the Second District panel. For planning purposes, each is treated as an **adverse or non-cooperative control point**: no critical step depends on voluntary assistance from any of them.

PRIMARY CONCLUSION

The highest-leverage independent lane is an Illinois Supreme Court Rule 383 motion aimed at the filing-access and sanctions-response deadlock. The July 31 order says appellant shall file nothing further “with this court” - the Second District. A Rule 383 motion is filed in a different court, under the Supreme Court’s supervisory authority, and can ask the Supreme Court to order an operative gateway without asking the Second District clerk for permission first.

I. THREAT MODEL - ASSUME EVERY EXISTING STATE ACTOR REMAINS NON-COOPERATIVE

Control point	Operational assumption	Design consequence
OSAD / McCoy	Will decline requested filings unless independently persuaded; no reliance on counsel to originate relief.	Counsel refusals become source exhibits. Independent Rule 383 and administrative channels carry the strategy.
Second District clerk	Will apply the July 31 bar literally and reject personal filings or requests.	Do not make the Second District intake desk the sole gateway to relief from its own lockout.
Second District panel	May preserve its August 7 forced-counsel theory and may view further pro se activity as process abuse.	Ask the Illinois Supreme Court for narrow supervisory relief rather than repeatedly tendering the same request below.
State / SAAP	Will use any fresh violation as additional sanctions evidence.	No direct appeal-related contact with SAAP while the restriction remains operative.

II. VECTOR 1 - RULE 383 SUPERVISORY GATEWAY: 10/10

This is the primary filing vector. The proposed motion does **not** ask the Supreme Court to decide the merits of the criminal appeal. It asks for a functional response channel: stay sanctions disposition temporarily; require the Second District clerk to accept one gateway motion; and require judicial consideration of sanctions-response access, counsel



discharge/substitution or limited conflict-free counsel, and clarification/modification of the filing bar.

This vector is stronger now than it was before August 25 because the sanctions motion and McCoy's August 27 refusal convert the filing restriction from an abstract hybrid-representation issue into a live access problem. Rule 375 says notice and an opportunity to respond. The present architecture supplies notice but no functioning speaker.

III. VECTOR 2 - CLERK-ADMINISTRATION / RULE 9 AUDIT: 9/10

The administrative complaint is kept separate from the merits. The core contradiction is objective: the August 17 rejection notice tells the filer to use a Rule 9 cure motion within five court days while the rejection reason invokes a command that, as implemented, prevents the filer from tendering that cure motion. Kaplan's August 14 email separately states that only counsel may make requests of the court or his office. This is an e-filing control and routing question even if the underlying judicial order remains valid.

This vector should seek reviewer attribution, the control flag or instruction used for Envelope Nos. 39386845 and 39528818, the approved correction path, and preservation of the native JMIS/eFileIL audit trail. It should not ask AOIC to reverse an appellate order.

IV. VECTOR 3 - FORCED-COUNSEL STATE-LAW CHALLENGE: 9/10

The August 7 order is the principal legal target. It expressly says the Second District can appoint counsel without appellant's request and maintain counsel over objection, despite Rule 607(a)'s "desires counsel on appeal" formulation. 725 ILCS 5/121-13(a) uses the same desire-based language. Your July 28 motion requested a Rule 607 determination and appointment **on that finding**; it was not an unconditional request for the reviewing court to bypass the predicate and permanently foreclose a timely objection.

Do not frame this as an unlimited federal Faretta right on appeal. Frame it as a narrower Illinois-law and access-to-process question: even if hybrid merits briefing can be barred, what mechanism exists to challenge continuation of unwanted counsel when the appointment itself is used to prohibit the motion challenging that appointment?

V. VECTOR 4 - JIB: PRESERVE, DO NOT LEAD

A Judicial Inquiry Board complaint is an external misconduct channel for active Illinois judges, including appellate justices. It cannot reverse the orders. The strongest JIB theory would therefore be documentary and conduct-specific: Rule 2.9 disclosure/provenance if an off-record communication is actually evidenced; use of undisclosed facts; or another judicial-conduct issue supported by primary records. The current no-contact order being sua sponte is a provenance question, not proof of ex parte contact. Keep the JIB packet ready, but the supervisory record should be built first.

VI. VECTOR 5 - FEDERAL RECORD ARCHITECTURE: PRESERVE THE LOCKOUT SEQUENCE

For later federal use, preserve a compact chronology rather than a volume dump: July 31 filing/no-contact order; August 7 forced-counsel holding; August 14 clerk lockout statement; August 17 eFile rejection; August 21 clarification; August 25 sanctions motion; August 27 counsel refusal. The federal point is the system configuration and contemporaneous record, not an unsupported allegation of motive.

**DEPLOYMENT ORDER**

1) File Rule 383 supervisory gateway in the Illinois Supreme Court. 2) Keep the AOIC/e-Business audit independent and source-controlled. 3) Use the Supreme Court result to decide whether a targeted JIB filing is warranted. 4) Do not depend on OSAD to originate any of these steps. 5) Preserve every rejection, refusal, and routing response as a dated exhibit.

VII. WHAT IS INTENTIONALLY NOT BEING SENT YET

No email is being sent to OSAD, the Second District clerk, SAAP, AOIC, JIB, or the Illinois Supreme Court as part of this review step. The only outgoing email authorized at this stage is the self-email containing this packet so styling, pagination, exhibit covers, and substance can be inspected before any external transmission.

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



ENCLOSURE REGISTER

EXHIBIT INDEX

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

EX.	RECORD	BATES / SOURCE
A	Proposed Rule 383 Self-Directed Gateway Motion - Review Copy Primary independent filing vector. It does not rely on OSAD or the Second District clerk to originate the request.	SDR-000001+
B	July 31, 2026 Second District Order - Appointment, Filing Bar, No-Contact Restriction Operative order stating appellant personally shall file nothing further with the Second District.	SDR-000010
C	August 7, 2026 Second District Order - Counsel Maintained Over Objection Order expressly stating counsel can be appointed without request and maintained over appellant's objection.	SDR-000011-000012
D	August 21, 2026 Second District Order - No-Contact Clarification Later clarification limiting the no-contact restriction to appellee's appellate counsel.	SDR-000013
E	People's First Motion for Sanctions - August 25, 2026 Pending sanctions request directed personally at appellant; paragraph 7 reports that opposing counsel indicated no response would be filed.	SDR-000014-000021
F	McCoy August 27, 2026 Written Refusal to Oppose Sanctions Shows appointed counsel will not provide the sanctions response channel.	SDR-000022
G	Kaplan August 14, 2026 Written Clerk-Side Lockout Shows clerk-side position that only appointed counsel may make requests of the court or clerk on appellant's behalf.	SDR-000023
H	August 17 eFileIL Rejection - Envelope 39528818 Shows the Rule 9 cure instruction and the simultaneous use of the July 31 filing bar to reject appellant's tender.	SDR-000024
I	AOIC / e-Business Rule 9 Second District Control Audit - Review Copy Separate administrative vector addressing intake mechanics and audit trail; not a merits appeal.	SDR-000025+
J	AOIC / e-Business Supplemental Appellate Intake Lockout Packet Follow-on administrative vector focused on the impossible-cure problem and live sanctions no-response condition.	SDR-000050+



EXHIBIT A

**Proposed Rule 383 Self-Directed Gateway Motion - Review
Copy**

SDR-000001+

*Primary independent filing vector. It does not rely on OSAD or the Second District clerk to originate
the request.*

EHAB ALLABABIDI,
Movant,

v.

JEFFREY H. KAPLAN,
Clerk of the Appellate Court,
Second District,
Respondent.

**IN THE SUPREME COURT
OF ILLINOIS**

Original Motion for Supervisory Order
Pursuant to Supreme Court Rule 383

From Appellate Court, Second District
No. 2-26-0352

Lake County No. 23 CF 1146

EMERGENCY MOTION FOR SUPERVISORY ORDER PURSUANT TO RULE 383 AND EXPLANATORY SUGGESTIONS

Movant Ehab Allababidi requests a narrow supervisory order restoring an operative channel through which he can be heard on sanctions directed personally against him and can present a threshold challenge to the continuation and scope of appointed appellate representation. The requested order does not ask this Court to adjudicate the merits of the criminal appeal. It asks this Court to correct a procedural lockout that now operates across the appellate clerk, the July 31 filing restriction, and appointed counsel's written refusal to answer the sanctions motion.

I. THE PRESENT CONFIGURATION HAS NO OPERATIVE RESPONSE OWNER

On July 31, 2026, the Second District appointed the Office of the State Appellate Defender and directed that “appellant himself shall file nothing further with this court.” The same order imposed a communication restriction. The filing restriction is textually limited to filings “with this court,” i.e., the Second District.

On August 7, after appellant and OSAD both sought to end the appointment, the Second District denied both requests. The court expressly stated that it could appoint counsel “even without appellant’s requests” and “maintain that appointment over his objection.” It relied on the number and nature of appellant’s filings and left the July 31 order standing.

On August 25, the People filed a verified motion seeking sanctions against appellant personally. Paragraph 7 states that opposing counsel indicated it would not file a response.

On August 27, Deputy Defender Christopher McCoy confirmed in writing that he will not file a sanctions response because, in his view, “there is nothing I can say in response to the State’s motion.” The July 31 order simultaneously prevents movant from filing a response himself in the Second District. The result is a personally directed sanctions proceeding with no functioning response channel.

II. RULE 375 MAKES THE ACCESS DEFECT IMMEDIATE

Illinois Supreme Court Rule 375(a) requires reasonable notice and an opportunity to respond before a party or attorney is sanctioned for a willful failure to comply with appellate rules. The Committee Comments further state that no sanction is intended for an inadvertent violation and that the target receives a reasonable opportunity to correct before sanction is imposed.

The present system does not merely regulate hybrid merits briefing. It prevents the sanctions target from tendering a response while appointed counsel affirmatively refuses to present one. The supervisory question is therefore operational: what filing owner, if any, can exercise the response opportunity Rule 375 requires?

III. THE CLERK-SIDE IMPLEMENTATION MAKES ORDINARY SECOND DISTRICT MOTION PRACTICE UNAVAILABLE

On August 14, Clerk Jeffrey H. Kaplan wrote that, because movant is represented, “only your counsel is permitted to make requests of the court or my office on your behalf.”

On August 17, eFileIL rejected Envelope No. 39528818 by quoting the July 31 command that appellant shall file nothing further. The standardized rejection notice simultaneously instructed the filer that Rule 9 permits a motion within five court days seeking the original submission date. Thus the notice prescribed a cure motion while the clerk-side implementation treated the filer as categorically unable to tender that cure motion.

This is why a Rule 361 motion filed in the Second District is not presently an adequate route to obtain relief from the Second District filing restriction: the clerk has already announced that the movant cannot personally make the request that would ask the court to modify the restriction.

IV. THE FORCED-COUNSEL ISSUE IS A STATE-LAW QUESTION THAT SHOULD BE PRESENTED WITHOUT HYBRID MERITS BRIEFING

Rule 607(a) directs the circuit court to determine whether an appellant is represented. If not, and if the court determines that the defendant is indigent and “desires counsel on appeal,” counsel shall be appointed. 725 ILCS 5/121-13(a) uses the same desire-based formulation for felony appeals.

Movant’s July 28 omnibus motion asked the reviewing court to direct a Rule 607(a) determination and to appoint counsel “on that finding.” The July 31 order instead appointed OSAD directly. Movant objected at the beginning of the appeal, not after merits briefing. The August 7 order then announced a broader proposition: that the court can maintain appellate counsel over the appellant’s objection notwithstanding the text of Rule 607(a).

This motion does not ask this Court to create a general right to hybrid appellate briefing. It asks for a gateway through which movant may obtain judicial review of whether counsel may be maintained over objection and, independently, whether a sanctions target may be denied any personal response channel when appointed counsel refuses to respond.

V. SUPERVISORY RELIEF IS THE CLEANEST INDEPENDENT CHANNEL

Rule 383 exists for a motion asking this Court to exercise supervisory authority over a lower court act. The July 31 order bars movant from filing “with this court,” meaning the Second District; it does not purport to bar an original Rule 383 motion in the Illinois Supreme Court.

A supervisory order can cure the access problem without deciding the criminal appeal. The order can require the Second District to provide one operative response mechanism and can direct the clerk to accept the threshold gateway submission for judicial disposition.

VI. RELIEF REQUESTED

- **Stay disposition of the pending sanctions motion** until movant has had a meaningful opportunity to respond through an identified channel;
- **Direct Respondent Kaplan to accept and present to the Second District for judicial disposition one gateway motion** limited to (a) leave for a client-limited sanctions response, (b) discharge/substitution or conflict-free limited-purpose counsel, and (c) clarification/modification of the personal filing restriction;
- **Alternatively direct the Second District to enter an order identifying the operative response channel** through which movant may respond to sanctions personally directed at him;
- **Direct that the July 31 filing restriction not be administratively construed to bar a motion whose sole purpose is to seek modification, clarification, or leave from that restriction**, including a Rule 9 original-submission-date cure;
- **Direct preservation of the eFileIL/JMIS audit records** associated with Envelope Nos. 39386845 and 39528818 pending resolution of the access question; and
- Grant such further supervisory relief as is necessary to ensure that a personally targeted sanctions proceeding has an actual response mechanism.

Respectfully submitted,

/s/ **Ehab Allababidi**

EHAB ALLABIDI, Movant, pro se

8516 W. Winona St., Chicago, Illinois 60656

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

PROPOSED SUPERVISORY ORDER

EHAB ALLABABIDI,
Movant,

v.

JEFFREY H. KAPLAN,
Clerk of the Appellate Court,
Second District,
Respondent.

**IN THE SUPREME COURT
OF ILLINOIS**

Original Motion for Supervisory Order
Pursuant to Supreme Court Rule 383

From Appellate Court, Second District
No. 2-26-0352

Lake County No. 23 CF 1146

Movant's emergency motion for supervisory order is **ALLOWED IN PART**.

Disposition of the People's pending sanctions motion in Appellate Court No. 2-26-0352 is stayed until the appellant has been afforded an operative opportunity to respond.

The Clerk of the Appellate Court, Second District, shall accept and present for judicial disposition a gateway motion submitted by Ehab Allababidi limited to: (1) leave to respond to sanctions; (2) discharge, substitution, or limited conflict-free counsel concerning sanctions; and (3) clarification or modification of the July 31, 2026 personal filing restriction.

The July 31, 2026 filing restriction shall not be implemented administratively to prevent tender of a motion whose sole purpose is to request judicial leave from, clarification of, or modification of that filing restriction.

Nothing in this order authorizes hybrid merits briefing or direct communication with appellee's appellate counsel contrary to an operative order of the Second District.

The parties and relevant court-administration personnel shall preserve the native eFileIL/JMIS audit trail for Envelope Nos. 39386845 and 39528818 pending further order.

ENTER: _____
JUSTICE

DATED: _____

CERTIFICATE OF FILING AND SERVICE - REVIEW COPY

I certify that, upon filing, the motion, explanatory suggestions, proposed order, and supporting record will be served as required by Illinois Supreme Court Rule 383(b) upon Respondent Jeffrey H. Kaplan; the People through the State's Attorneys Appellate Prosecutor; and appointed counsel of record for the appellant. The final filing copy will identify the eFileIL service contacts and any additional nominal party required by the Supreme Court docket.

/s/ Ehab Allababidi



EXHIBIT B

**July 31, 2026 Second District Order - Appointment, Filing
Bar, No-Contact Restriction**

SDR-000010

Operative order stating appellant personally shall file nothing further with the Second District.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

July 31, 2026

Ehab Allababidi
8516 W. Winona St.
Chicago, IL 60656

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, July 31, 2026, entered the following order in the above entitled case:

Appellant's "omnibus emergency motion" is granted as to its request for the appointment of appellate counsel, and the Office of the State Appellate Defender is hereby appointed. Now having been appointed counsel, appellant himself shall file nothing further with this court and shall not communicate by any means with appellee's counsel. Appellant's "omnibus" motion, and his other pending motions, are otherwise denied without prejudice to any motion filed by his counsel, including a motion to stay. (Appellant's counsel is hereby advised of appellant's suggestion that his jail term will begin on August 6, 2026.) This court reserves any issue of its jurisdiction.

Jeffrey H. Kaplan
Clerk of the Court

cc: Christopher Michael McCoy
Max Christian Boose



EXHIBIT C

**August 7, 2026 Second District Order - Counsel Maintained
Over Objection**

SDR-000011-000012

*Order expressly stating counsel can be appointed without request and maintained over appellant's
objection.*



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

August 7, 2026

Ehab Allababidi
8516 W. Winona St.
Chicago, IL 60656

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, August 07, 2026, entered the following order in the above entitled case:

Appellant's motion for leave to reply is granted. However, appellant's motion to vacate the appointment of counsel, and appellant's counsel's motion to withdraw, are denied.

Appellant clearly made multiple requests for counsel, which this court could grant. Appellant's indigency was established by his application to waive court fees, and thus this court could grant appellant's requests without a remand to the circuit court.

In any event, however, this court could appoint counsel even without appellant's requests, and it can now maintain that appointment over his objection. As appellee notes, appellant has no constitutional right to represent himself. To be sure, Rule 607(a) states that, if an indigent appellant "desires counsel on appeal, the court shall appoint counsel on appeal." But this is a very far cry from stating that the court *may* appoint counsel *only* if the appellant desires counsel.

Here, 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. Accordingly, this court's order of July 31 will stand.

Jeffrey H. Kaplan
Clerk of the Court

cc: Jaime Ling Montgomery



EXHIBIT D

**August 21, 2026 Second District Order - No-Contact
Clarification**

SDR-000013

Later clarification limiting the no-contact restriction to appellee's appellate counsel.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

August 21, 2026

Christopher Michael McCoy
Deputy Defender
Office of the State Appellate Defender
One Douglas Avenue, Second Floor
Elgin, IL 60120

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, August 21, 2026, entered the following order in the above entitled case:

Appellant's motion to modify this court's order of July 31, 2026, is granted, as this court's intent in entering that order was to prohibit communication only with appellee's *appellate* counsel.

Appellant's motion to stay is denied. If this order indeed moots this appeal, appellant may move to dismiss it.

Jeffrey H. Kaplan
Clerk of the Court

cc: Jaime Ling Montgomery
Lake County Circuit Court
Max Christian Boose



EXHIBIT E

People's First Motion for Sanctions - August 25, 2026

SDR-000014-000021

Pending sanctions request directed personally at appellant; paragraph 7 reports that opposing counsel indicated no response would be filed.



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.

THE PEOPLE'S FIRST MOTION FOR SANCTIONS

The People of the State of Illinois, by Eric F. Rinehart, State's Attorney of Lake County, Illinois, through Edward R. Psenicka, Deputy Director, and Max C. Boose, Staff Attorney, State's Attorneys Appellate Prosecutor, respectfully move for sanctions against defendant for violating this Court's Orders.

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 must not either file documents with this Court or "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 while asserting 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. This Court ruled 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." It further referenced the bar on defendant communicating directly with the undersigned office, holding that "this court's order of July 31 will stand."

4. On August 18, 2026, defendant filed a motion to modify order, wherein he did not challenge the prohibition on direct contact with the office of the State's Attorneys Appellate Prosecutor. Def. Mtn. Modify Order, p. 2. On August 21, 2026, this Court granted defendant's motion to modify its July 31, 2026, ruling that "this court's intent in entering that order was to prohibit communication only with appellee's *appellate* counsel." (emphasis in original).

5. On August 23, 2026, defendant directed electronic correspondence to the undersigned office in violation of this Court's unambiguous orders. Defendant included the 2nd District ILSAAP email account in the "To" recipient box, and confirmed the intended recipients in the body of the email: "State's Attorneys Appellate Prosecutor / Lake County State's Attorney." See Def. Aug 23 Email, attached as Exhibit 1. Defendant includes demands for various actions styled as

“administrative returns.” Ex. 1. Defendant explicitly confirms that directing the correspondence to the undersigned office was intentional, stating “Appellate counsel are copied for transparency.” Ex. 1. The email sender is defendant’s address which he has previously listed with this Court as his own, and defendant ends the document with his own name. Ex. 1. Defendant’s attached document lists this appeal’s case name and Second District case number, and demands action for seven responses. Def. Email Attachment, attached as Exhibit 2. The body of the attachment confirms defendant’s intentional communication to the undersigned office, stating “Appellate counsel are copied here for transparency” while also acknowledging this Court’s ruling from August 7, 2026, stating he is “represented in the appeal.” Ex. 2, p. 1. Defendant’s attachment is also consistent with prior correspondence directed to the undersigned office. Ex. 2; Def. July 31, 2026, Letter.

6. The People submit that defendant has violated the plain language of this Court’s Orders, and indicates an intention to continue sending successive correspondence and demands for responses. In light of defendant’s plain refusal to obey this Court’s Orders, the People request such sanctions as this Court deems appropriate to ensure compliance with its Orders.

7. The undersigned has supplied a copy of this motion to opposing counsel for their position. Opposing counsel has indicated they will not file a response.

WHEREFORE, for the foregoing reasons, the People of the State of Illinois respectfully request that this Court enter sanctions against defendant for violating its Orders.

Respectfully submitted,

Eric F. Rinehart
State's Attorney
Lake County
Waukegan, Illinois 60085
(847) 377-3000

Edward R. Psenicka
Deputy Director

By /s/ Max C. Boose
Max C. Boose
Staff Attorney
State's Attorneys
Appellate Prosecutor
2032 Larkin Avenue
Elgin, Illinois 60123
(847) 697-0020
2nndistrict.eserve@ilsaap.org

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

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

From: [2nd District](#)
To: [Max Boose](#); [Edward R. Psenicka](#)
Cc: [Lake County](#)
Subject: Fw: FOLLOW-UP / RECORD LOCK — No. 2-26-0352 — July 30 Hold / Aug. 4 Deadline / Preservation Status Due Aug. 25
Date: Monday, August 24, 2026 9:06:45 AM
Attachments: [SAAP RECORD LOCK AUG23.pdf](#)

Thank you,

Shari Lavick, Administrative Secretary
State's Attorneys Appellate Prosecutor
2032 Larkin Avenue
Elgin, Illinois 60123
(847) 697-0020
2nndistrict.eserve@ilsaap.org

From: Ehab Hilfiger <defcon5ready@gmail.com>
Sent: Sunday, August 23, 2026 8:53 PM
To: 2nd District; statesattorney@lakecountyil.gov
Cc: Christopher.McCoy@osad.state.il.us; Jaime.Montgomery@osad.state.il.us;
2ndDistrict@osad.state.il.us
Subject: FOLLOW-UP / RECORD LOCK — No. 2-26-0352 — July 30 Hold / Aug. 4 Deadline / Preservation Status Due Aug. 25

State's Attorneys Appellate Prosecutor / Lake County State's Attorney:
Attached is a compact follow-up to the July 30 litigation-hold and correction package. I am not resending the 48 pages you already received. The August 4 deadline has expired, and I have not located a written response from either office in the sending mailbox.
Because OSAD now represents me in the appeal, this is not a merits brief and asks no merits concession. It asks for seven verifiable administrative returns only: whether the hold issued; whether any correction/supplement was filed; whether the May 28 and June 17 ECR recordings and access/export logs are preserved; whether the DeRosa tenant-lifecycle records are preserved; whether the June 15 Odyssey/eFile audit trail is preserved; and whether you dispute the identity/authenticity of any source record in the July 30 exhibit register.
A seven-line response is sufficient. Please return it by 5:00 P.M. CDT Tuesday, August 25, 2026. Silence will be recorded only as no response located by the deadline, not as agreement or admission.
Appellate counsel are copied for transparency.
Respectfully and without waiver,
Ehab Allababidi



FOLLOW-UP / RECORD LOCK

People v. Allababidi - Appeal No. 2-26-0352

RE: July 30 litigation hold and correction demand | August 4 deadline expired | preservation and docket-status return only

WRITTEN RESPONSE REQUESTED BY 5:00 P.M. CDT TUESDAY, AUGUST 25, 2026

The original 48-page package is not reattached. You already received it. This follow-up asks for the small set of binary or docket-identifiable answers that remain independently verifiable after the August 4 deadline.

I. THE PURPOSE OF THIS FOLLOW-UP

The July 30 letter separated legal disagreement from preservation and correction. It identified the exact rule texts, the exact paragraphs challenged, the May 28 and June 17 ECR records, the DeRosa recipient-status chronology, and the docket-entry audit issue. Its response deadline passed on August 4. I have not located a written response from the State's Attorneys Appellate Prosecutor or the Lake County State's Attorney in the sending mailbox. This letter does not repeat the merits argument. It locks the post-notice record.

The Illinois Appellate Court has since denied the requested stay of sentence while granting counsel's motion to modify the July 31 order. Appellate counsel are copied here for transparency. Because I am represented in the appeal, this transmission is limited to preservation, correction-status identification, and administrative record ownership; it is not an attempt to brief the merits outside counsel.

II. SEVEN RETURNS THAT RESOLVE THE ADMINISTRATIVE RECORD

#	RETURN	EXACT QUESTION
1	Litigation hold	Was the July 30 preservation hold issued? If yes, identify by title the person/unit responsible. If no, state no.
2	Filed correction	Did the People file any correction, supplement, withdrawal, or amended position responsive to the July 30 notice? Identify title/date or state none.
3	May 28 ECR	Confirm whether the May 28, 2026 Courtroom 611 electronic recording and access/export logs are preserved.
4	June 17 ECR	Confirm whether the June 17, 2026 Courtroom 611 electronic recording and access/export logs are preserved.
5	DeRosa tenant records	Confirm preservation of recipient-object lifecycle, alias/proxy, mailbox/retention, message-trace, and audit records for fderosa@lakecountyil.gov for June 1-July 30, 2026.
6	Odyssey/eFile audit	Confirm preservation of audit history for the June 15, 2026 entry displayed publicly as "Correspondence," including document-type assignment and actor identity.
7	Source dispute	If you dispute the identity/authenticity of any source record listed in the July 30 enclosure register, identify the exhibit letter and the specific basis. Otherwise state no source-identification dispute.

III. WHAT THIS LETTER DELIBERATELY DOES NOT DO

It does not demand a concession on the stay, jurisdiction, or merits. It does not condition any disciplinary or agency submission on settlement or corrective action. It does not assert that any person destroyed evidence. It does not ask a represented party's adversary to bypass appellate counsel. It asks whether preservation happened and whether any correction was filed after notice. Those facts are either true or false on fixed dates.



IV. WHY THE ORIGINAL PACKET IS NOT REATTACHED

The July 30 letter itself made the point: padding a follow-up with paper the recipient already possesses is how a record gets skimmed. The original package remains the operative notice. This follow-up is a receipt-and-status instrument. If your office needs the original retransmitted for administrative reasons, say so and I will send the identical preserved copy, not a rewritten substitute.

V. DEADLINE AND RESPONSE FORM

A seven-line response keyed to items 1-7 is sufficient. Please return it by **5:00 P.M. CDT Tuesday, August 25, 2026**. Silence will be recorded only as no response located by the deadline, not as agreement, admission, or waiver.

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



No. 2-26-0352

E-FILED
Transaction ID: 2-26-0352
File Date: 8/25/2026 11:04 AM

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

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.

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 the People's motion for sanctions in the above-entitled cause is being electronically filed with the Clerk of the Appellate Court, Second District, on August 25, 2026. Upon acceptance of the filing from this Court, the party listed above will be served using the court's electronic filing system.

/s/ Luisa Gonzalez
Luisa Gonzalez, Legal Secretary
State's Attorneys Appellate Prosecutor
2032 Larkin Avenue
Elgin, Illinois 60123
(847) 697-0020
2nndistrict.eserve@ilsaap.org

GMAIL SOURCE RECORD

From: Christopher McCoy <Christopher.McCoy@osad.state.il.us>
To: Ehab Allababidi <defcon5ready@gmail.com>
Date: August 27, 2026
Subject: Re: Appeal No. 2-26-0352 - Immediate Response Required to People's First Motion for Sanctions
Gmail message id: 1a0441203ac59234

Mr. Allababidi:

I will not be filing a response to the State's motion for sanctions because I do not believe there is any meritorious response to make. The Appellate Court's order clearly prohibited you communicating with the appellate prosecutor's office. It did not make an exception for communications that were not an official filing nor was there an exception for communications in which our office was cc'ed on the email nor was there an exception for doing it only one time. As the order was clearly violated, there is nothing I can say in response to the State's motion.

Second, I will not be filing a motion for limited remand because I do not see a benefit to you from this motion. If we were able to get the case remanded to the trial court and the court did quash the warrant, the fact is that your jail sentence still is not stayed pending appeal. In short, since our motion to stay was vacated, it does not matter if the warrant is recalled or not.

[Remaining email preserved in Gmail. This exhibit reproduces the operative portions relevant to sanctions-response ownership and limited-remand refusal.]

GMAIL SOURCE RECORD

From: Jeffrey Kaplan <jkaplan@illinoiscourts.gov>
To: Ehab Hilfiger <defcon5ready@gmail.com>
Cc: Christopher.McCoy@osad.state.il.us; 2ndDistrict@osad.state.il.us
Date: August 14, 2026 at 2:23 PM
Subject: RE: FORMAL NOTICE - No. 2-26-0352 - Envelope 39386845 / Clerk Rejection / Litigation Hold - Response Requested Aug. 17
Gmail message id: 1a000a852d4e69e3

Dear Mr. Allababidi,

Unfortunately, since you're represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.

Jeffrey H. Kaplan
Clerk of the Court
Illinois Appellate Court, Second District

Shows clerk-side position that only appointed counsel may make requests of the court or clerk on appellant's behalf.

GMAIL / EFILEIL SOURCE RECORD

From: no-reply@efilingmail.tylertech.cloud
Forwarded intact to: defcon5ready@gmail.com
Date: August 17, 2026 at 2:05 PM
Subject: Filing Rejected for Envelope Number: 39528818 in Case: 2-26-0352, People v. Allababidi, Ehab for filing Motion - Stay
Gmail message id preserving forwarded source: 1a0101bc976a8f2d

Filing Rejected
Envelope Number: 39528818
Case Number: 2-26-0352
Case Name: People v. Allababidi, Ehab

The document below has been rejected for the reason(s) stated. Please correct and resubmit. If the corrected document will be late, Illinois Supreme Court Rule 9 permits you to file a motion asking the court to treat the corrected document as filed on the date/time it was originally submitted. If you intend to do so, you must file that motion within 5 court days of this notice.

Rejection Reason(s) from Clerk's Office
Court: Appellate Court - 2nd District
Rejection Reason: Rejection by Clerk.
Rejection Comments: Per the court's order of July 31, "appellant himself shall file nothing further with this court."

Document Details
Date/Time Submitted: 8/14/2026 11:48 PM CST
Filing Type: EFileAndServe
Filing Description: Verified Emergency Motion to Vacate July 31 Restrictions, for Immediate Rule 609(a) Stay, Warrant Relief, and Rule 607(b) Order
Filing Code: Motion - Stay
Filed By: Ehab Allababidi

SOURCE NOTE: The language above is reproduced verbatim from the native forwarded Gmail record. The original Tyler/eFileIL notification remains preserved in Gmail and the eFileIL account.



EXHIBIT I

**AOIC / e-Business Rule 9 Second District Control Audit -
Review Copy**

SDR-000025+

Separate administrative vector addressing intake mechanics and audit trail; not a merits appeal.

SECOND FORMAL CONTROL NOTICE - SOURCE PATH, CURE PATH, PRESERVATION,
AND EBUSINESS REVIEWPRESERVATION CONFIRMATION DUE AUGUST 28 -
SOURCE-PATH RESPONSE DUE SEPTEMBER 1

Administrative Control Notice and Demand for Rule 9(h) Audit

John Chatz, Chief of eBusiness & Data Strategies - Administrative Office of the Illinois Courts

Jacque Rogers, Interim Director, Court Services Division - Administrative Office of the Illinois Courts

Alison Spanner, Director, Access to Justice and Strategic Planning - Administrative Office of the Illinois Courts

3101 Old Jacksonville Road, Springfield, Illinois 62704 - 222 N. LaSalle St., 13th Floor, Chicago, Illinois 60601

Administrative routing requested: Recordkeeping & Technology / eBusiness Policy Advisory Board staff support; JMIS as necessary for native system preservation.

CONTROL RECORD

People v. Allababidi, No. 2-26-0352 - eFileIL Envelopes 39386845 and 39528818

Rule 9(h) - Reviewing Courts Rejection Standards 22 and 23 - prior AOIC notices August 14 and August 17 - current filing blackout / sanctions-response dead end

AOIC eBusiness and Court Services:

This is the second formal administrative control notice concerning the Second District intake lockout in **People v. Allababidi, No. 2-26-0352**. AOIC received the first complaint on August 14 and a targeted supplement on August 17. The issue is now narrower, better documented, and no longer susceptible to being treated as a generic disagreement with a judicial ruling. **The August 17 rejection notice contains an administratively impossible cure on its face.**

THE CONTROL FAILURE

[The eFileIL notice says: "Please correct and resubmit." It separately tells the filer that Rule 9 permits a motion for original submission date within five court days. The clerk comment then supplies the reason for rejection: "appellant himself shall file nothing further with this court." The notice therefore directs a corrective filing and, in the same instrument, states the condition under which that corrective filing cannot be accepted from the person to whom the instruction is addressed.]

I. RULE 9(H) AND THE PUBLISHED REJECTION STANDARDS LEAVE AN AUDITABLE ADMINISTRATIVE QUESTION

Illinois Supreme Court Rule 9(h), as amended May 29, 2026, provides that electronically filed documents may be rejected by the clerk **only as authorized by the published Electronic Filing Rejection Standards**. The current Reviewing Courts Electronic Filing Rejection Standards, updated April 1, 2026, include Standard 22, "Rejection by Clerk (see comments)," whose prescribed comment requires the clerk to insert the **specific reason for rejection and how to correct**. The August 17 notice supplies a reason. It supplies **no correction path** capable of being used by the recipient of the notice.

The same standards separately identify Standard 23, "Motion for leave to file denied," and describe the sequence in judicial terms: **the motion for leave is denied by the court; therefore the underlying document is rejected**. That published architecture distinguishes judicial denial of gateway relief from clerk-side rejection. The present record does not disclose which architecture actually produced Envelope 39528818.



II. THERE ARE ONLY TWO POSSIBLE ADMINISTRATIVE SOURCE PATHS; AOIC CAN IDENTIFY WHICH ONE OCCURRED

SOURCE PATH	WHAT THE RECORD SHOULD SHOW	WHY IT MATTERS ADMINISTRATIVELY
Judicially directed rejection	A case-level filing-control directive, judicial instruction, docket event, or other auditable control specifically requiring the clerk to reject this class of submission.	Then the clerk acted as the implementing arm of a judicial command. AOIC can say so without reviewing the merits of that command.
Clerk-side interpretation	A reviewer or supervisory decision interpreting "file nothing further" to bar the very motion seeking to vacate, modify, clarify, or obtain leave from that restriction.	Then AOIC has a Rule 9(h) implementation question: who made the interpretation, under what rejection standard, and what corrective route was supplied to the filer?

Those are different facts. They are stored in different places. One should be traceable to a judicial instruction or case-level control. The other should be traceable to reviewer identity, rejection code, routing notes, supervisory approval, and clerk-side guidance. The distinction can be audited without asking AOIC to reverse a single order.

III. THE LOCKOUT HAS BECOME FUNCTIONAL, NOT THEORETICAL

On August 7, the Second District expressly stated that it could maintain appointed counsel over appellant's objection and left the July 31 filing restriction standing. On August 27, appointed counsel stated in writing that he will not file any response to the People's pending sanctions motion because, in his view, "there is nothing I can say." The sanctions request is directed at appellant personally. The administrative effect is therefore concrete: **the appellant is barred from filing; appointed counsel declines to respond; and the intake system provides no identified gateway through which the appellant can ask the court itself for leave to be heard on that personal sanctions issue.**

AOIC does not supervise OSAD's litigation strategy, and this notice asks AOIC to do no such thing. Exhibit G is supplied for one reason only: it demonstrates that the intake control is not an abstract inconvenience. It presently determines whether any response path exists at all.

IV. THE AUGUST 14 AND AUGUST 17 NOTICES HAVE NOT BEEN ANSWERED ON THE QUESTIONS THAT MATTER

The prior AOIC packet already supplied a controlled comparator: the First District acknowledged in writing that one pro se rejection there "was done in error" and instructed staff accordingly. I did not ask AOIC to force identical results across districts. I asked AOIC to identify why the systems diverged and to preserve the native audit trail. The August 17 supplement reduced that request to five administrative questions: authority path, reviewer attribution, cross-district reconciliation, guidance/training, and corrective-action record. **Those questions remain the correct questions.**

V. REQUIRED ADMINISTRATIVE ACTIONS

- 1 Preserve now.** Place an administrative hold on the complete native records for Envelopes 39386845 and 39528818, including submission payloads, reviewer identifiers/roles, timestamps, rejection codes, comments, routing notes, supervisory review, case-level filing flags, help-desk tickets, and communications with Tyler Technologies or reviewing-court personnel concerning the rejection logic.



- 2 **Identify the source path.** State whether Envelope 39528818 was rejected pursuant to a specific judicially entered or judicially communicated implementation directive, a clerk-side interpretation of the July 31 order, an automated case flag, or some combination. If a judicial directive exists, identify its date and administrative form without disclosing privileged judicial deliberations.
- 3 **Identify the Rule 9(h) standard actually used.** If Standard 22 was used, state what AOIC regards as the required "how to correct" instruction where the rejection reason itself bars the filer from submitting the corrective motion identified in the notice. If another standard was used, identify it.
- 4 **Resolve the gateway question administratively.** State the eFileIL / clerk-routing mechanism by which a represented appellant subject to a personal filing restriction can tender a motion whose sole purpose is to ask the court for leave to file, to modify the restriction, to discharge or challenge appointed counsel, or to respond to sanctions personally directed at him when appointed counsel declines to do so. I am asking for the routing mechanism, not a ruling on whether such relief should be granted.
- 5 **Route this notice to the Supreme Court eBusiness Policy Advisory Board through the Recordkeeping & Technology / Court Services staff that support it.** The issue is a statewide control-design question: a rejection notice should not prescribe a corrective motion that the same intake logic makes impossible to submit.
- 6 **Return a written administrative answer.** Confirm preservation by **5:00 p.m. Friday, August 28, 2026**. Identify the responsible AOIC unit, incident owner, and source-path determination by **5:00 p.m. Tuesday, September 1, 2026**. If AOIC declines any requested administrative review, identify the office that owns the function and the routing action taken.

VI. WHAT THIS NOTICE DOES NOT ASK AOIC TO DO

This notice does not ask AOIC to reverse the July 31 or August 7 orders, decide the pending sanctions motion, direct the Second District how to rule, or resolve any question of appellate jurisdiction. It asks AOIC to perform the task that only an administrative system owner can perform: **identify the control, identify the source of the control, identify the authorized rejection standard, identify the cure path, and preserve the machine record.**

There is no factual ambiguity left about whether the lockout exists. There is only an unanswered systems question about how it is being implemented and whether the published cure architecture is real for this filer. **That answer now belongs in writing.**

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



ENCLOSURE REGISTER

EXHIBIT INDEX

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

EX.	RECORD	BATES / SOURCE
A	August 17 eFileIL rejection - Envelope 39528818 The rejection directs a Rule 9 corrective motion while simultaneously invoking a filing bar that makes that corrective motion unavailable to the filer.	AOIC2-000001
B	July 31, 2026 Second District order The order appoints OSAD and states that appellant himself shall file nothing further with the court.	AOIC2-000002
C	August 7, 2026 Second District order The court expressly states it may maintain appointed counsel over appellant's objection and leaves the July 31 order standing.	AOIC2-000003
D	August 21, 2026 Second District clarification order The court later clarifies the separate communication restriction, confirming that scope clarification was procedurally available when presented through counsel.	AOIC2-000005
E	August 14 AOIC administrative complaint and source exhibits Prior notice to AOIC: Second District intake lockout, First District correction, and Envelope 39386845 source record.	AOIC2-000006
F	August 17 AOIC supplemental administrative reconciliation Prior supplemental notice requesting mechanism identification, reviewer attribution, cross-district reconciliation, and preservation.	AOIC2-000018
G	August 27 appointed-counsel written refusal to answer sanctions Context only: the court-imposed personal filing blackout now operates alongside counsel's express refusal to present a response to sanctions directed at appellant personally.	AOIC2-000019

GMAIL / EFILEIL SOURCE RECORD

From: no-reply@efilingmail.tylertech.cloud
Forwarded intact to: defcon5ready@gmail.com
Date: August 17, 2026 at 2:05 PM
Subject: Filing Rejected for Envelope Number: 39528818 in Case: 2-26-0352, People v. Allababidi, Ehab for filing Motion - Stay
Gmail message id preserving forwarded source: 1a0101bc976a8f2d

Filing Rejected
Envelope Number: 39528818
Case Number: 2-26-0352
Case Name: People v. Allababidi, Ehab

The document below has been rejected for the reason(s) stated. Please correct and resubmit. If the corrected document will be late, Illinois Supreme Court Rule 9 permits you to file a motion asking the court to treat the corrected document as filed on the date/time it was originally submitted. If you intend to do so, you must file that motion within 5 court days of this notice.

Rejection Reason(s) from Clerk's Office
Court: Appellate Court - 2nd District
Rejection Reason: Rejection by Clerk.
Rejection Comments: Per the court's order of July 31, "appellant himself shall file nothing further with this court."

Document Details
Date/Time Submitted: 8/14/2026 11:48 PM CST
Filing Type: EFileAndServe
Filing Description: Verified Emergency Motion to Vacate July 31 Restrictions, for Immediate Rule 609(a) Stay, Warrant Relief, and Rule 607(b) Order
Filing Code: Motion - Stay
Filed By: Ehab Allababidi

SOURCE NOTE: The language above is reproduced verbatim from the native forwarded Gmail record. The original Tyler/eFileIL notification remains preserved in Gmail and the eFileIL account.

The rejection directs a Rule 9 corrective motion while simultaneously invoking a filing bar that makes that corrective motion unavailable to the filer.



EXHIBIT B

July 31, 2026 Second District order

AOIC2-000002

The order appoints OSAD and states that appellant himself shall file nothing further with the court.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

July 31, 2026

Ehab Allababidi
8516 W. Winona St.
Chicago, IL 60656

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, July 31, 2026, entered the following order in the above entitled case:

Appellant's "omnibus emergency motion" is granted as to its request for the appointment of appellate counsel, and the Office of the State Appellate Defender is hereby appointed. Now having been appointed counsel, appellant himself shall file nothing further with this court and shall not communicate by any means with appellee's counsel. Appellant's "omnibus" motion, and his other pending motions, are otherwise denied without prejudice to any motion filed by his counsel, including a motion to stay. (Appellant's counsel is hereby advised of appellant's suggestion that his jail term will begin on August 6, 2026.) This court reserves any issue of its jurisdiction.

Jeffrey H. Kaplan
Clerk of the Court

cc: Christopher Michael McCoy
Max Christian Boose



EXHIBIT C

August 7, 2026 Second District order

AOIC2-000003

The court expressly states it may maintain appointed counsel over appellant's objection and leaves the July 31 order standing.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

August 7, 2026

Ehab Allababidi
8516 W. Winona St.
Chicago, IL 60656

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, August 07, 2026, entered the following order in the above entitled case:

Appellant's motion for leave to reply is granted. However, appellant's motion to vacate the appointment of counsel, and appellant's counsel's motion to withdraw, are denied.

Appellant clearly made multiple requests for counsel, which this court could grant. Appellant's indigency was established by his application to waive court fees, and thus this court could grant appellant's requests without a remand to the circuit court.

In any event, however, this court could appoint counsel even without appellant's requests, and it can now maintain that appointment over his objection. As appellee notes, appellant has no constitutional right to represent himself. To be sure, Rule 607(a) states that, if an indigent appellant "desires counsel on appeal, the court shall appoint counsel on appeal." But this is a very far cry from stating that the court *may* appoint counsel *only* if the appellant desires counsel.

Here, 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. Accordingly, this court's order of July 31 will stand.

Jeffrey H. Kaplan
Clerk of the Court

cc: Jaime Ling Montgomery



EXHIBIT D

August 21, 2026 Second District clarification order

AOIC2-000005

The court later clarifies the separate communication restriction, confirming that scope clarification was procedurally available when presented through counsel.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

August 21, 2026

Christopher Michael McCoy
Deputy Defender
Office of the State Appellate Defender
One Douglas Avenue, Second Floor
Elgin, IL 60120

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, August 21, 2026, entered the following order in the above entitled case:

Appellant's motion to modify this court's order of July 31, 2026, is granted, as this court's intent in entering that order was to prohibit communication only with appellee's *appellate* counsel.

Appellant's motion to stay is denied. If this order indeed moots this appeal, appellant may move to dismiss it.

Jeffrey H. Kaplan
Clerk of the Court

cc: Jaime Ling Montgomery
Lake County Circuit Court
Max Christian Boose



EXHIBIT E

August 14 AOIC administrative complaint and source exhibits

AOIC2-000006

Prior notice to AOIC: Second District intake lockout, First District correction, and Envelope 39386845 source record.

ADMINISTRATIVE TRANSMITTAL & FORMAL COMPLAINT

DEMAND FOR COMPLIANCE AUDIT, ADMINISTRATIVE REMEDIATION, AND PRESERVATION DIRECTIVE PURSUANT TO ILLINOIS SUPREME COURT RULE 9(h) & ACCESS TO JUSTICE MANDATES

DATE: August 14, 2026

TO: **Marcia M. Meis**, Director, Administrative Office of the Illinois Courts (AOIC)

Alison Spanner, Director, Access to Justice and Strategic Planning, AOIC

Judicial Management Information Services (JMIS) / eFileIL Program Administration

3101 Old Jacksonville Road, Springfield, Illinois 62704 | 222 N. LaSalle St., 13th Fl., Chicago, IL 60601

COPIES TO:

Jeffrey H. Kaplan, Clerk of the Appellate Court, Second District (jkaplan@illinoiscourts.gov)

Tina Schillaci, Clerk of the Appellate Court, First District (1stDistrict@illinoiscourts.gov)

Douglas R. Hoff, Deputy Defender, OSAD 1st District (1stDistrict@osad.state.il.us)

Christopher M. McCoy, OSAD 2d District (Christopher.McCoy@osad.state.il.us)

FROM: Ehab Allababidi, Self-Represented Litigant (defcon5ready@gmail.com | 773-920-0030)

RE: Systemic Non-Compliance with *Reviewing Courts Electronic Filing Rejection Standards*; Extra-Statutory Appellate Intake Lockout; Case Nos. 2-26-0352 and 1-26-0055

EXECUTIVE COMPLAINT SUMMARY: This formal administrative complaint requests immediate inquiry by the Administrative Office of the Illinois Courts into the recurring refusal of reviewing court clerk personnel to comply with the Illinois Supreme Court’s mandatory *Reviewing Courts Electronic Filing Rejection Standards* (effective April 1, 2026). In the Second District, an electronic filing (Envelope No. 39386845) was rejected with an unelaborated notation (“See order of 8/7”), applied retroactively to an August 6 submission; and on August 14, 2026, Clerk Jeffrey H. Kaplan confirmed in writing that the clerk’s office refuses to accept any request or filing from a represented litigant personally. In the First District, Envelope No. 39310613 was similarly rejected without statutory authority, which Chief Deputy Clerk Lisa Franklin formally conceded in writing on August 14 “was done in error,” confirming complainant’s right to file pro se. When appointed counsel refuses to challenge an unconstitutional arrest warrant, this extra-statutory administrative intake lockout produces a complete breakdown of access to justice.

I. STATUTORY & REGULATORY FRAMEWORK (ILL. S. CT. R. 9(h))

Illinois Supreme Court Rule 9(h) was promulgated to eliminate arbitrary, extra-judicial rejections by court clerk personnel. It incorporates the published *Reviewing Courts Electronic Filing Rejection Standards*, which establish an exhaustive, uniform schedule of permissible rejection grounds. Under Standard No. 22 (“Rejection by Clerk (see comments)”), the clerk is strictly mandated to: **[INSERT SPECIFIC REASON FOR REJECTION AND HOW TO CORRECT.]**

The Standards do not permit clerk staff to invent non-statutory grounds, to apply orders retroactively to pre-dated submissions, or to convert administrative intake desks into judicial filters.

II. DOCUMENTED VIOLATIONS ACROSS THE APPELLATE DISTRICTS

1. Second District Appellate Court (Envelope No. 39386845): On August 6, 2026 at 11:31 a.m. CST, Complainant submitted an emergency filing containing critical Brady/Giglio structural records. On August 7, 2026 at 12:15 p.m., the Clerk’s Office rejected the submission, stating solely: “See order of 8/7.” The order cited did not exist when the filing was tendered. When Complainant served a formal Notice of Ministerial Duty on August 13, Clerk Jeffrey H. Kaplan replied in writing on August 14, 2026: “Unfortunately, since you’re represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.” (Attached as Exhibit A).

2. First District Appellate Court (Envelope No. 39310613): On August 2, 2026, Complainant submitted a motion to vacate or limit appointed counsel. On August 4, 2026, the Clerk’s Office rejected the filing with the comment: “Contact your attorney at the State Appellate Defenders office.” Following Complainant’s Rule 9(f) filing, Chief Deputy Clerk Lisa Franklin

conducted an administrative review and advised Complainant in writing on August 14, 2026 that the rejection “**was done in error,**” that Complainant “**currently [has] the right to file into your case pro-se,**” and instructed staff not to reject conforming filings. (Attached as Exhibit B).

III. THE DENIAL OF ACCESS TO JUSTICE & SUBSTANTIVE DUE PROCESS

The contrast between the First District’s administrative correction and the Second District’s ongoing refusal exposes a profound administrative breakdown. In Lake County Appeal No. 2-26-0352, an active arrest warrant was issued on May 28, 2026. On August 13, 2026, armed officers came to Complainant’s residence at 8516 W. Winona St. to execute that warrant.

Appointed counsel refuses to file an emergency motion to quash or stay the warrant, yet the Second District Clerk’s Office refuses to accept any pro se emergency submission. This unconstitutional catch-22 completely shuts the courthouse door while liberty is under active, armed threat.

IV. FORMAL ADMINISTRATIVE DEMANDS & LITIGATION HOLD

Complainant respectfully demands that the AOIC take the following emergency administrative measures:

1. Administrative Compliance Audit: Initiate an immediate administrative inquiry into the electronic filing review and rejection practices of the Appellate Court, Second District, to ensure compliance with Ill. S. Ct. R. 9(h) and published Reviewing Courts Rejection Standards.

2. Corrective Administrative Guidance: Issue written guidance to reviewing court clerks confirming that clerk personnel possess no adjudicative authority to reject filings based on representation status without judicial order, and that litigants retain the right to submit emergency filings challenging the scope of representation or unconstitutional custody conditions.

3. Electronic Records Preservation Directive (Litigation Hold): Direct JMIS and Tyler Technologies, Inc. to immediately quarantine and preserve all native audit logs, transaction histories, rejection-event configuration metadata, and reviewer timestamps for Envelope Nos. 39386845 and 39310613.

4. Written Administrative Response: Provide a written response to this complaint by **August 21, 2026**, detailing the corrective actions taken.

VERIFICATION PURSUANT TO 735 ILCS 5/1-109

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this administrative complaint are true and correct.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Self-Represented Complainant*

8516 W. Winona St., Chicago, Illinois 60656

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

Dated: August 14, 2026

ADMINISTRATIVE OFFICE OF THE ILLINOIS COURTS
INDEX OF SUPPORTING ADMINISTRATIVE EXHIBITS & DOCUMENTARY EVIDENCE

Complainant EHAB ALLABABIDI certifies under 735 ILCS 5/1-109 that the following exhibits are true, correct, and unaltered copies of official clerk correspondence, administrative emails, and electronic filing manager rejection records:

Exhibit	Title / Description	Classification / Source
EXHIBIT A	Second District Clerk Jeffrey H. Kaplan Written Refusal & Notice of Ministerial Duty	Official Written Correspondence of Appellate Court Clerk's Office
EXHIBIT B	First District Chief Deputy Clerk Lisa Franklin Written Correction & Directive	Official Written Correspondence of Appellate Court Clerk's Office
EXHIBIT C	Official eFileIL Rejection Notice for Envelope No. 39386845 (Aug. 7, 2026)	Official Record of Electronic Filing Manager (Tyler Technologies / eFileIL)

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Complainant*

8516 W. Winona St., Chicago, Illinois 60656

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

EXHIBIT A

SECOND DISTRICT CLERK JEFFREY H. KAPLAN WRITTEN REFUSAL & NOTICE OF MINISTERIAL

Classification: Official Written Correspondence of Appellate Court Clerk's Office

WHAT THIS EXHIBIT ESTABLISHES

Proves total, official written administrative lockout of complainant personally at the appellate court intake desk.

VISIBLE ON THE FACE OF THE SOURCE

- Email sent Friday, August 14, 2026 at 2:23 PM by Jeffrey H. Kaplan, Clerk of the Court, Illinois Appellate Court, Second District.
- Verbatim statement: 'Unfortunately, since you're represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.'
- Demonstrates clerk-level enforcement of extra-statutory representation filter preventing administrative inquiries.

ADMINISTRATIVE AUDIT RELEVANCE

Direct evidence of the Second District's refusal to accept pro se communications or compliance inquiries.

SOURCE AUTHENTICATION & CONTROL

1. Gmail - RE_ FORMAL NOTICE — No. 2-26-0352 — Envelope 39386845 _ Clerk
Rejection _ Litigation Hold — Response Requested Aug. 17.pdf
Complete native record (3 pages) • Classification: Official Written Correspondence of Appellate
Court Clerk's Office

SHA-256:
E5B1F946B1AAC54F29640268FF5046F8EB8A3D0A159B7B3349C9C85AA29249D9



Ehab Hilfiger <defcon5ready@gmail.com>

RE: FORMAL NOTICE — No. 2-26-0352 — Envelope 39386845 / Clerk Rejection / Litigation Hold — Response Requested Aug. 17

1 message

Jeffrey Kaplan <jkaplan@illinoiscourts.gov>

Fri, Aug 14, 2026 at 2:23 PM

To: Ehab Hilfiger <defcon5ready@gmail.com>

Cc: "Christopher.McCoy@osad.state.il.us" <Christopher.McCoy@osad.state.il.us>, 2ndDistrict OSAD <2ndDistrict@osad.state.il.us>

Dear Mr. Allababidi,

Unfortunately, since you're represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.

Jeffrey H. Kaplan

Clerk of the Court

Illinois Appellate Court

Second District

[55 Symphony Way](#)[Elgin, IL 60120-5558](#)

(847) 695-3750

From: Ehab Hilfiger <defcon5ready@gmail.com>**Sent:** Thursday, August 13, 2026 4:50 PM**To:** Jeffrey Kaplan <jkaplan@IllinoisCourts.gov>**Cc:** Christopher.McCoy@osad.state.il.us; 2ndDistrict OSAD <2ndDistrict@osad.state.il.us>**Subject:** FORMAL NOTICE — No. 2-26-0352 — Envelope 39386845 / Clerk Rejection / Litigation Hold — Response Requested Aug. 17

Mr. Kaplan:

Attached is my August 13, 2026 **Notice of Ministerial Duty, Demand for the Intake Instruction, and Litigation Hold**, with exhibits, concerning **People v. Allababidi, No. 2-26-0352** and eFileIL **Envelope No. 39386845**.

The issue is narrow and documented.

Envelope No. 39386845 was submitted on **August 6, 2026 at 11:31 a.m. CST**. The Clerk's Office refused it on **August 7, 2026 at 12:15 p.m.** with the complete rejection comment:

"See order of 8/7."

The attached packet preserves the rejection notice, the August 7 order invoked by the rejection, the July 31 order, the relevant docketing materials, and the associated record.

Please treat the **litigation hold in Part VII as effective upon receipt of this transmission** and transmit it to the person responsible for records retention for the Clerk's Office and, to the extent any identified systems are centrally administered, to the appropriate records custodian.

Part VIII requests a written response by **5:00 p.m. Monday, August 17, 2026**, including:

1. whether any intake instruction, flag, direction, protocol, or communication concerning my submissions exists;
2. the identity and title of the person who reviewed and refused Envelope No. 39386845 and anyone consulted;
3. the specific authority relied upon for that refusal;
4. confirmation of the submission/rejection chronology and the Office's position concerning application of the August 7 order to the August 6 submission;
5. the standing intake rule applicable to any future conforming submission requesting leave to file;
6. written confirmation that the litigation hold has been implemented; and
7. whether this letter and exhibits will be placed in the file of No. 2-26-0352 and before the Court, or the specific ground on which the Clerk's Office declines to do so.

I am not asking the Clerk's Office to adjudicate any disputed legal issue or to rule in my favor. I am asking for the identity, authority, instruction, and preservation record underlying an act performed by the Clerk's Office, and for a written answer concerning how conforming submissions will be handled going forward.

The attachment is transmitted as the complete supporting record. Please confirm receipt of the entire PDF and preservation of this email and attachment in native form with associated metadata.

Mr. McCoy and the Second District Office of the State Appellate Defender are copied because OSAD remains appointed counsel in this appeal.

Consistent with the Court's July 31 order, **appellee's counsel is not copied on this transmission**.

Respectfully and without waiver of any right or remedy,

Ehab Allababidi
Pro Se
No. 2-26-0352
defcon5ready@gmail.com

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Ehab Allababidi

PHONE 773-920-0030

EMAIL defcon5ready@gmail.com

CAGE 16QC7

DarkDeck

LEGAL NOTICE & CONFIDENTIALITY

This email and any attachments may contain confidential, privileged, proprietary, trade-secret, controlled, or otherwise legally protected information intended solely for the named recipient or authorized recipient group. If you received this communication in error, please notify the sender promptly, refrain from reviewing, copying, forwarding, or distributing its contents, and delete all copies within your control.

CUI & SENSITIVE BUSINESS RECORDS: Do not send Controlled Unclassified Information (CUI), controlled government information, export-controlled material, sensitive business records, or other confidential operational data to this Gmail address. Authorized CUI or sensitive business records must be directed to ehab@darkdeck.ai through an approved secure transmission method and only after confirming the applicable handling requirements.

Transmission does not waive any privilege, protection, objection, defense, right, confidentiality interest, or preservation position. No statement in this message creates a binding agreement, admission, waiver, modification, or commitment unless expressly stated and authorized in writing. Any express request, deadline, preservation demand, compliance directive, or recordkeeping instruction contained in the body of the message constitutes written notice and should be retained with the complete native email, attachments, headers, and associated metadata.

EXHIBIT B

FIRST DISTRICT CHIEF DEPUTY CLERK LISA FRANKLIN WRITTEN CORRECTION & DIRECTIVE

Classification: Official Written Correspondence of Appellate Court Clerk's Office

WHAT THIS EXHIBIT ESTABLISHES

Proves administrative admission that rejection of pro se filing was error and confirms right to file pro se.

VISIBLE ON THE FACE OF THE SOURCE

- Email sent August 14, 2026 by Lisa Franklin, Chief Deputy Clerk, Appellate Court, First District.
- Express written admission that the rejection of Envelope No. 39310613 'was done in error.'
- Expressly confirms: 'You currently have the right to file into your case pro-se.'
- Confirms staff were instructed not to reject pro se filings if otherwise in order.

ADMINISTRATIVE AUDIT RELEVANCE

Serves as the benchmark of correct administrative compliance under Ill. S. Ct. R. 9(h).

SOURCE AUTHENTICATION & CONTROL

1. FRANKLIN_EMAIL_AUG14_2026.pdf
Complete native record (1 pages) • Classification: Official Written Correspondence of Appellate Court Clerk's Office

SHA-256:
2803411CCCF550650864E2053E7C5FBA9001D59902987DE9D8DDA32194772114

From: Lisa Franklin <lfranklin@illinoiscourts.gov>
Sent: Friday, August 14, 2026
To: Ehab Hilfiger <defcon5ready@gmail.com>
Cc: 1stDistrict@osad.state.il.us; eserve.criminalappeals@cookcountysao.org
Subject: Re: Case No. 1-26-0055 — Envelope No. 39310613 / Pro Se Submission Status

Dear Mr. Allababidi,

Please be advised that the rejection of your e-filing submission in Envelope No. 39310613 on August 4, 2026, **was done in error**.

You **currently have the right to file into your case pro-se**. Our intake staff have been instructed not to reject your filings if they are otherwise in order.

You are invited to resubmit your motion in a new electronic envelope through the e-filing system, ensuring that proper service is effected upon both the Cook County State's Attorney's Office and the Office of the State Appellate Defender.

Sincerely,

Lisa Franklin

Chief Deputy Clerk
Appellate Court of Illinois, First District
160 N. LaSalle Street, 14th Floor
Chicago, Illinois 60601
(312) 793-5600

EXHIBIT C

OFFICIAL EFILEIL REJECTION NOTICE FOR ENVELOPE NO. 39386845 (AUG. 7, 2026)

Classification: Official Record of Electronic Filing Manager (Tyler Technologies / eFileIL)

WHAT THIS EXHIBIT ESTABLISHES

Demonstrates non-compliance with Reviewing Courts Electronic Filing Rejection Standards.

VISIBLE ON THE FACE OF THE SOURCE

- Date/Time Submitted: 8/6/2026 11:31 AM CST. Date/Time Rejected: 8/7/2026 12:15 PM.
- Rejection Reason: 'Rejection by Clerk.' Rejection Comments: 'See order of 8/7.'
- Failed to specify any statutory standard number, factual explanation, or corrective instructions.

ADMINISTRATIVE AUDIT RELEVANCE

Concrete documentation of non-conforming rejection requiring AOIC compliance intervention.

SOURCE AUTHENTICATION & CONTROL

1. 2D_REJECTION_39386845_2026-08-07.pdf

Complete native record (2 pages) • Classification: Official Record of Electronic Filing Manager (Tyler Technologies / eFileIL)

SHA-256:

2668B0114F3C1837EE6DF9D89A5DB5B3FC0BEAAB67F174F9B5C277C7FB641E7



Filing Rejected for Envelope Number: 39386845 in Case: 2-26-0352, People v. Allababidi, Ehab for filing Motion - Supplement
1 message

<no-reply@efilingmail.tylertech.cloud>
To: ehabhilfiger@gmail.com

Fri, Aug 7, 2026 at 12:15 PM

Filing Rejected



Envelope Number: 39386845
Case Number: 2-26-0352
Case Name: People v. Allababidi, Ehab

The document below has been rejected for the reason(s) stated. Please correct and resubmit. If the corrected document will be late, [Illinois Supreme Court Rule 9](#) permits you to file a motion asking the court to treat the corrected document as filed on the date/time it was originally submitted. If you intend to do so, you must file that motion within 5 court days of this notice.

If you need further information, contact the [court clerk](#).

Rejection Reason(s) from Clerk's Office		
Court		Appellate Court – 2nd District
Rejection Reason		Rejection by Clerk.
Rejection Comments		See order of 8/7

Document Details	
Case Number	2-26-0352
Case Name	People v. Allababidi, Ehab
Date/Time Submitted	8/6/2026 11:31 AM CST
Filing Type	EFileAndServe
Filing Description	Supplement & Declaration re Aug. 6 Proceeding; Renewed Special-Prosecutor Request
Filing Code	Motion - Supplement
Filed By	Ehab Allababidi
Filing Attorney	

To learn how to copy the rejected filing so that you can make changes to refile, [click here](#).

If you are not represented by a lawyer, we want to improve your e-filing experience. Please [click here](#) to fill out a short survey.



EXHIBIT F

August 17 AOIC supplemental administrative reconciliation

AOIC2-000018

Prior supplemental notice requesting mechanism identification, reviewer attribution, cross-district reconciliation, and preservation.

DATE	August 17, 2026
VIA	Email
TO	Director Marcia M. Spanner / Administrative Office of the Illinois Courts Access to Justice Division
RE	People v. Allababidi, Nos. 1-26-0055 & 2-26-0352 — First District error admission / Second District order-based rejection

SUPPLEMENTAL EVIDENCE AND ADMINISTRATIVE RECONCILIATION

Director Spanner and AOIC:

This supplements my August 15 administrative complaint and preservation notice with two later, concrete records that materially sharpen the issue. I am not asking AOIC to review, modify, stay, countermand, or interpret the merits of any judicial order. I am asking AOIC to reconcile and preserve the administrative record showing how reviewing-court filing restrictions are implemented by clerk personnel and eFileIL/Tyler systems.

New comparator evidence

- 1. First District - written correction.** On August 14, Chief Deputy Clerk Lisa Franklin advised that the rejection in No. 1-26-0055 “was done in error,” that the Clerk’s Office “does not make determinations on requests,” and that staff had been instructed not to reject future documents if the other filing requirements were met.
- 2. Second District - later order-based rejection.** On August 17, eFileIL Envelope No. 39573506 in No. 2-26-0352 was rejected with a stated reason tied to the July 31, 2026 order that “petitioner shall file nothing further.” The point is not that these two outcomes must be identical; the point is that the record now permits AOIC to identify precisely why they are different and what administrative controls produced each result.

Administrative questions requiring a written answer

- 1. Authority path.** Identify whether the August 17 Second District rejection was generated by a clerk-side case restriction, a manual reviewer decision, an automated rule, a judicially entered filing-control flag, or some combination.
- 2. Reviewer attribution.** Preserve and, to the extent administratively disclosable, identify the reviewer role, reviewer identifier, rejection code, timestamp, routing notes, and any supervisory approval associated with Envelope 39573506.
- 3. Cross-district reconciliation.** State whether AOIC considers the First District correction and the Second District rejection to reflect different judicial instructions, different administrative implementation, or both.
- 4. Guidance and training.** Preserve any guidance, training, help-desk instruction, escalation protocol, or AOIC/Tyler communication addressing represented litigants, filing restrictions, clerk rejection authority, and routing of requests for judicial disposition.
- 5. Corrective-action record.** Preserve any record showing whether the First District’s admitted August 14 error generated a staff instruction, correction, training event, incident record, or system change.

Preservation demand

Please preserve the complete native and system record for Envelopes 39310613, 39386845, and 39573506, including submission payloads, reviewer identities/roles, audit logs, rejection codes, timestamps, notes, internal forwards, help-desk tickets, system flags, administrative rules, and communications with Tyler Technologies or reviewing-court personnel concerning those envelopes or case-level filing restrictions.

A concise written response identifying the administrative mechanism and confirming preservation would resolve the present AOIC issue far more efficiently than another merits discussion. If AOIC takes the position that the divergence is entirely explained by different judicial orders, please say so expressly and identify the administrative record on which that conclusion rests.

Respectfully and without waiver,

Ehab Allababidi

Founder & Principal Architect · Dark Deck LLC
Private AI · Zero-Trust Systems · Digital Forensics
darkdeck.ai · architect.estate

LEGAL NOTICE & RECORD PRESERVATION. This communication concerns pending legal and administrative proceedings. Express preservation and recordkeeping instructions should be retained with the complete native email, attachments, headers, routing information, and associated metadata. Transmission does not waive any privilege, protection, objection, defense, right, or remedy.

GMAIL SOURCE RECORD

From: Christopher McCoy <Christopher.McCoy@osad.state.il.us>
To: Ehab Allababidi <defcon5ready@gmail.com>
Date: August 27, 2026
Subject: Re: Appeal No. 2-26-0352 – Immediate Response Required to People’s First Motion for Sanctions
Gmail message id: 1a0441203ac59234

Mr. Allababidi:

I will not be filing a response to the State's motion for sanctions because I do not believe there is any meritorious response to make. The Appellate Court's order clearly prohibited you communicating with the appellate prosecutor's office. It did not make an exception for communications that were not an official filing nor was there an exception for communications in which our office was cc'ed on the email nor was there an exception for doing it only one time. As the order was clearly violated, there is nothing I can say in response to the State's motion.

Second, I will not be filing a motion for limited remand because I do not see a benefit to you from this motion. If we were able to get the case remanded to the trial court and the court did quash the warrant, the fact is that your jail sentence still is not stayed pending appeal. In short, since our motion to stay was vacated, it does not matter if the warrant is recalled or not. Also, I very much doubt that the appellate court would grant a limited remand. While the appellate court has the authority to enter limited remands, those are normally done when an issue has been fully briefed and the case is being sent back for a specific hearing (usually a Batson hearing or a Krankel inquiry). Here, we do not have the record yet, so we cannot fully brief any of these issues. There are also potential downsides for filing a limited remand motion. Filing this motion may make the appellate court more inclined to dismiss your appeal for lack of jurisdiction due to the ongoing proceedings in the trial court. If the remand is allowed, the State may be more inclined to take you into custody.

If you want this appeal to continue and have the appellate court consider it, my professional opinion is that we wait for the normal appellate process to take its course. Unfortunately, this does take time as the record needs to be prepared and then an attorney will need to review the record.

Christopher McCoy | Deputy Defender
Office of the State Appellate Defender
2nd Judicial District



EXHIBIT J

**AOIC / e-Business Supplemental Appellate Intake Lockout
Packet**

SDR-000050+

*Follow-on administrative vector focused on the impossible-cure problem and live sanctions
no-response condition.*

SUPPLEMENTAL ADMINISTRATIVE COMPLAINT - SOURCE-CONTROLLED - LIVE
SANCTIONS NO-RESPONSE CONDITIONIMMEDIATE ROUTING AND PRESERVATION
REQUESTED

A Rejection Protocol Cannot Prescribe a Cure Motion and Then Make That Cure Motion Impossible to File

Alison Spanner, Director, Access to Justice and Strategic Planning, AOIC
AOIC Staff / Supreme Court e-Business Policy Advisory Board · aspanner@illinoiscourts.gov
Skip Robertson, Chief Information Officer, JMIS · srobertson@illinoiscourts.gov
Nathan Jensen, Director, Court Services / Board Staff · njensen@illinoiscourts.gov
Administrative Office of the Illinois Courts · 222 N. LaSalle St., 13th Floor, Chicago, IL 60601

ROUTING REQUEST: Supreme Court e-Business Policy Advisory Board Chair Cynthia A. Grant or other reviewer independent of the Second District Clerk's implementation at issue

ADMINISTRATIVE QUESTION

People v. Allababidi - No. 2-26-0352 - Second District reviewing-court intake

Rule 9(h) rejection authority - Standards 22 and 23 - Envelope 39528818 - blanket filing restriction - pending personal sanctions - appointed counsel's written refusal to respond

AOIC and e-Business Policy Advisory Board staff:

This supplement does not ask the Administrative Office to reverse an appellate order, decide a sanctions motion, or substitute administrative staff for judges. It asks a narrower question the present record no longer permits the system to avoid: **what is the authorized reviewing-court intake route when a judicial filing blackout, clerk-side rejection, and appointed counsel's written refusal combine to eliminate every vehicle by which the affected appellant can ask the court for leave, challenge the representation arrangement, or answer sanctions directed at him personally?**

The August 14 complaint identified the lockout before that question became outcome-determinative. It has now matured. On August 25 the People filed a verified motion seeking sanctions against me personally. On August 27 appointed appellate counsel wrote that he will file no response because, in his words, there is 'nothing I can say.' I remain subject to the July 31 direction that I 'shall file nothing further with this court.' The administrative system therefore has a live test case: **counsel says nothing; the litigant may file nothing; sanctions remain pending.**

I. THE AUGUST 17 REJECTION DEMONSTRATES A CLOSED-LOOP CURE DEFECT

Envelope 39528818 was submitted on August 14. The August 17 eFileIL notice rejected it under 'Rejection by Clerk' and quoted the July 31 filing blackout. The same standardized notice then instructed that Rule 9 permits a motion within five court days to preserve the original submission date. Those instructions cannot coexist as implemented. **The system directed a cure motion while the Clerk's Office simultaneously treated the order as barring the filer from submitting the cure motion.**

Current Rule 9(h) provides that electronically filed documents may be rejected by a clerk **only** as authorized by the published Electronic Filing Rejection Standards. The Reviewing Courts Standards, updated April 1, 2026, make Standard 22's instruction explicit: 'Rejection by Clerk' requires the clerk to **insert the specific reason for rejection and how to correct**. Standard 23 separately identifies the posture in which a motion for leave to file **has been denied by the court**. The question presented here is not whether Standard 22 exists. It is what correction path Standard 22 requires when the stated reason is an order that, as administratively implemented, forecloses every gateway filing.



THE SYSTEM CONTRADICTION

The rejection notice says: file a Rule 9 cure motion within five court days. The rejection comment says: appellant himself shall file nothing further. Clerk Kaplan separately says: only counsel may make requests to the court or his office. Appointed counsel now says: he will not respond to sanctions. An administrative filing protocol cannot identify a cure and simultaneously make that cure impossible to tender.

II. I AM REQUESTING A ROUTING RULE, NOT AN ADMINISTRATIVE MERITS RULING

There is a straightforward way to resolve this without asking AOIC to touch the merits of No. 2-26-0352. The reviewing-court system needs a defined gateway for documents whose sole purpose is to ask the judges whether filing permission exists. Examples include a motion for leave to file a sanctions response, a motion addressing continuation or discharge of appointed counsel, a request identifying a conflict in representation, or a Rule 9 motion for original submission date after rejection.

If the rule is that such a gateway submission must be accepted for judicial disposition notwithstanding a general filing restriction, say so and identify the filing code or intake procedure. If the rule is that the clerk may reject even the gateway motion without presenting it to the court, identify the Supreme Court-approved rejection authority and state **how the filer is expected to correct the rejection**. A circular answer - 'ask counsel,' where counsel has refused - is not an intake procedure.

III. THE PRESENT SANCTIONS POSTURE REMOVES ANY ARGUMENT THAT THIS IS ACADEMIC

Record	What it fixes
July 31 order	Appellant personally may file nothing further.
August 14 Kaplan email	Only appointed counsel may make requests of the court or Clerk's Office.
August 17 rejection	A personally tendered emergency motion is rejected by invoking the July 31 order, while the standardized notice directs a Rule 9 cure motion.
August 25 sanctions motion	The People seek sanctions against appellant personally; paragraph 7 states opposing counsel indicated no response would be filed.
August 27 McCoy email	Appointed counsel confirms that he will not file a sanctions response.

That sequence is enough. No allegation of motive is required. No finding of clerk misconduct is required. No disagreement with the Second District's merits rulings is required. The defect is architectural and visible on the face of official records: **the person exposed to sanctions currently has no functioning filing owner for his response.**

IV. THE BOARD-ROUTING ISSUE SHOULD BE HANDLED OUTSIDE MR. KAPLAN'S PARTICIPATION

The Supreme Court's current committee listing identifies Jeffrey H. Kaplan as a member of the Supreme Court e-Business Policy Advisory Board. The same listing identifies Cynthia A. Grant as Chair and Nathan Jensen, Skip Robertson, and Alison Spanner as AOIC staff or ex-officio participants. The Board has been part of the Supreme Court's e-filing standards architecture. Because this request concerns the Second District Clerk's implementation of that architecture, I request that any Board-level review be routed to the Chair or other personnel **without asking Mr. Kaplan to review his own office's implementation**. This is a routing safeguard, not a personal accusation.



V. SEVEN ADMINISTRATIVE DETERMINATIONS REQUESTED

- 1 **Gateway filing rule.** State the reviewing-court intake procedure for a represented appellant subject to a blanket personal filing restriction who seeks only leave to file, discharge or substitution of counsel, conflict review, or a client-limited sanctions response.
- 2 **Standard 22 correction instruction.** State what 'how to correct' means when the stated rejection reason is a judicial order saying the filer may file nothing.
- 3 **Standard 23 boundary.** State whether a clerk may treat a gateway motion itself as non-fileable before a judge has denied leave, and identify the controlling authority for that intake decision.
- 4 **Rule 9 original-submission-date cure.** State how a filer can invoke Rule 9(f)'s five-court-day remedy when the clerk interprets the operative order as prohibiting the Rule 9 motion itself.
- 5 **Sanctions-response routing.** Identify the authorized administrative route by which a sanctions target can obtain judicial consideration of a request to respond when appointed counsel has expressly refused to answer and the litigant is barred from filing personally.
- 6 **Preservation.** Preserve the complete eFileIL/JMIS audit record for Envelope Nos. 39386845 and 39528818, including submission, reviewer, rejection, status, comment, user-action, and configuration/flag metadata sufficient to reconstruct each transaction. Preserve the corresponding native clerk correspondence already identified in the August 14 packet.
- 7 **Forward if outside lane.** If AOIC or the Board staff conclude that any requested determination belongs elsewhere, forward this packet to the office with authority to answer it and identify that office in writing. Do not return a generic statement that AOIC cannot alter a judicial ruling; no such alteration is requested.

VI. NARROW DISCLOSURE AND REQUESTED RESPONSE

Exhibit G reproduces a limited portion of an attorney-client communication because counsel's refusal is the event that converted the intake problem into a current access problem. I intentionally disclose that portion for this administrative review. I do not request publication or distribution beyond personnel reasonably necessary to evaluate routing and e-filing implementation, while recognizing that the legal effect of disclosure is governed by applicable law.

Please acknowledge routing within one business day and identify the person or unit responsible for the response. I am not asking for courtesy language. I am asking for an operational answer that can be followed by a clerk, a represented litigant, and appointed counsel without contradiction.

WHAT CLOSES THIS SUPPLEMENT

One written gateway rule. One correction path that actually exists. One answer to how a personally targeted sanctions respondent gets heard when counsel refuses to respond. Preservation of the two e-filing audit trails. If the existing standards do not answer those questions, identify the gap and route it to the body that can.

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



ENCLOSURE REGISTER

EXHIBIT INDEX

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

EX.	RECORD	BATES / SOURCE
A	Prior AOIC administrative complaint and evidence packet - August 14, 2026 Establishes prior notice, the earlier rejection chronology, and Clerk Kaplan's written representation-status intake position.	AOIC-SUPP-A
B	eFileLL rejection - Envelope 39528818 - August 17, 2026 The rejection notice directs use of a Rule 9 cure motion while the rejection comment invokes the order that prevents appellant from filing that motion.	AOIC-SUPP-B
C	Second District order - July 31, 2026 The operative filing blackout: 'appellant himself shall file nothing further with this court.'	AOIC-SUPP-C
D	Second District order - August 7, 2026 The court maintains appointed counsel over appellant's objection and leaves the July 31 order standing.	AOIC-SUPP-D
E	Second District order - August 21, 2026 The court later narrows the no-contact component; the filing blackout remains operative.	AOIC-SUPP-E
F	People's First Motion for Sanctions - filed August 25, 2026 The pending motion seeks sanctions against appellant personally and states opposing counsel indicated no response would be filed.	AOIC-SUPP-F
G	OSAD Deputy Defender written refusal to answer sanctions - August 27, 2026 Counsel's written position makes the intake lockout operationally consequential: counsel will not respond while appellant remains barred from filing personally.	AOIC-SUPP-G
H	Second District Clerk's representation-status intake statement - August 14, 2026 Clerk Kaplan states that only appointed counsel may make requests of the court or clerk's office on appellant's behalf.	AOIC-SUPP-H



EXHIBIT A

**Prior AOIC administrative complaint and evidence packet -
August 14, 2026**

AOIC-SUPP-A

*Establishes prior notice, the earlier rejection chronology, and Clerk Kaplan's written
representation-status intake position.*

The pages that follow are a true copy of the referenced record, produced without alteration.

ADMINISTRATIVE TRANSMITTAL & FORMAL COMPLAINT

DEMAND FOR COMPLIANCE AUDIT, ADMINISTRATIVE REMEDIATION, AND PRESERVATION DIRECTIVE PURSUANT TO ILLINOIS SUPREME COURT RULE 9(h) & ACCESS TO JUSTICE MANDATES

DATE: August 14, 2026

TO: **Marcia M. Meis**, Director, Administrative Office of the Illinois Courts (AOIC)

Alison Spanner, Director, Access to Justice and Strategic Planning, AOIC

Judicial Management Information Services (JMIS) / eFileIL Program Administration

3101 Old Jacksonville Road, Springfield, Illinois 62704 | 222 N. LaSalle St., 13th Fl., Chicago, IL 60601

COPIES TO:

Jeffrey H. Kaplan, Clerk of the Appellate Court, Second District (jkaplan@illinoiscourts.gov)

Tina Schillaci, Clerk of the Appellate Court, First District (1stDistrict@illinoiscourts.gov)

Douglas R. Hoff, Deputy Defender, OSAD 1st District (1stDistrict@osad.state.il.us)

Christopher M. McCoy, OSAD 2d District (Christopher.McCoy@osad.state.il.us)

FROM: Ehab Allababidi, Self-Represented Litigant (defcon5ready@gmail.com | 773-920-0030)

RE: Systemic Non-Compliance with *Reviewing Courts Electronic Filing Rejection Standards*; Extra-Statutory Appellate Intake Lockout; Case Nos. 2-26-0352 and 1-26-0055

EXECUTIVE COMPLAINT SUMMARY: This formal administrative complaint requests immediate inquiry by the Administrative Office of the Illinois Courts into the recurring refusal of reviewing court clerk personnel to comply with the Illinois Supreme Court’s mandatory *Reviewing Courts Electronic Filing Rejection Standards* (effective April 1, 2026). In the Second District, an electronic filing (Envelope No. 39386845) was rejected with an unelaborated notation (“See order of 8/7”), applied retroactively to an August 6 submission; and on August 14, 2026, Clerk Jeffrey H. Kaplan confirmed in writing that the clerk’s office refuses to accept any request or filing from a represented litigant personally. In the First District, Envelope No. 39310613 was similarly rejected without statutory authority, which Chief Deputy Clerk Lisa Franklin formally conceded in writing on August 14 “was done in error,” confirming complainant’s right to file pro se. When appointed counsel refuses to challenge an unconstitutional arrest warrant, this extra-statutory administrative intake lockout produces a complete breakdown of access to justice.

I. STATUTORY & REGULATORY FRAMEWORK (ILL. S. CT. R. 9(h))

Illinois Supreme Court Rule 9(h) was promulgated to eliminate arbitrary, extra-judicial rejections by court clerk personnel. It incorporates the published *Reviewing Courts Electronic Filing Rejection Standards*, which establish an exhaustive, uniform schedule of permissible rejection grounds. Under Standard No. 22 (“Rejection by Clerk (see comments)”), the clerk is strictly mandated to: **[INSERT SPECIFIC REASON FOR REJECTION AND HOW TO CORRECT.]**

The Standards do not permit clerk staff to invent non-statutory grounds, to apply orders retroactively to pre-dated submissions, or to convert administrative intake desks into judicial filters.

II. DOCUMENTED VIOLATIONS ACROSS THE APPELLATE DISTRICTS

1. Second District Appellate Court (Envelope No. 39386845): On August 6, 2026 at 11:31 a.m. CST, Complainant submitted an emergency filing containing critical Brady/Giglio structural records. On August 7, 2026 at 12:15 p.m., the Clerk’s Office rejected the submission, stating solely: “See order of 8/7.” The order cited did not exist when the filing was tendered. When Complainant served a formal Notice of Ministerial Duty on August 13, Clerk Jeffrey H. Kaplan replied in writing on August 14, 2026: “Unfortunately, since you’re represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.” (Attached as Exhibit A).

2. First District Appellate Court (Envelope No. 39310613): On August 2, 2026, Complainant submitted a motion to vacate or limit appointed counsel. On August 4, 2026, the Clerk’s Office rejected the filing with the comment: “Contact your attorney at the State Appellate Defenders office.” Following Complainant’s Rule 9(f) filing, Chief Deputy Clerk Lisa Franklin

conducted an administrative review and advised Complainant in writing on August 14, 2026 that the rejection “**was done in error,**” that Complainant “**currently [has] the right to file into your case pro-se,**” and instructed staff not to reject conforming filings. (Attached as Exhibit B).

III. THE DENIAL OF ACCESS TO JUSTICE & SUBSTANTIVE DUE PROCESS

The contrast between the First District’s administrative correction and the Second District’s ongoing refusal exposes a profound administrative breakdown. In Lake County Appeal No. 2-26-0352, an active arrest warrant was issued on May 28, 2026. On August 13, 2026, armed officers came to Complainant’s residence at 8516 W. Winona St. to execute that warrant.

Appointed counsel refuses to file an emergency motion to quash or stay the warrant, yet the Second District Clerk’s Office refuses to accept any pro se emergency submission. This unconstitutional catch-22 completely shuts the courthouse door while liberty is under active, armed threat.

IV. FORMAL ADMINISTRATIVE DEMANDS & LITIGATION HOLD

Complainant respectfully demands that the AOIC take the following emergency administrative measures:

1. Administrative Compliance Audit: Initiate an immediate administrative inquiry into the electronic filing review and rejection practices of the Appellate Court, Second District, to ensure compliance with Ill. S. Ct. R. 9(h) and published Reviewing Courts Rejection Standards.

2. Corrective Administrative Guidance: Issue written guidance to reviewing court clerks confirming that clerk personnel possess no adjudicative authority to reject filings based on representation status without judicial order, and that litigants retain the right to submit emergency filings challenging the scope of representation or unconstitutional custody conditions.

3. Electronic Records Preservation Directive (Litigation Hold): Direct JMIS and Tyler Technologies, Inc. to immediately quarantine and preserve all native audit logs, transaction histories, rejection-event configuration metadata, and reviewer timestamps for Envelope Nos. 39386845 and 39310613.

4. Written Administrative Response: Provide a written response to this complaint by **August 21, 2026**, detailing the corrective actions taken.

VERIFICATION PURSUANT TO 735 ILCS 5/1-109

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this administrative complaint are true and correct.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Self-Represented Complainant*

8516 W. Winona St., Chicago, Illinois 60656

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

Dated: August 14, 2026

ADMINISTRATIVE OFFICE OF THE ILLINOIS COURTS
INDEX OF SUPPORTING ADMINISTRATIVE EXHIBITS & DOCUMENTARY EVIDENCE

Complainant EHAB ALLABABIDI certifies under 735 ILCS 5/1-109 that the following exhibits are true, correct, and unaltered copies of official clerk correspondence, administrative emails, and electronic filing manager rejection records:

Exhibit	Title / Description	Classification / Source
EXHIBIT A	Second District Clerk Jeffrey H. Kaplan Written Refusal & Notice of Ministerial Duty	Official Written Correspondence of Appellate Court Clerk's Office
EXHIBIT B	First District Chief Deputy Clerk Lisa Franklin Written Correction & Directive	Official Written Correspondence of Appellate Court Clerk's Office
EXHIBIT C	Official eFileIL Rejection Notice for Envelope No. 39386845 (Aug. 7, 2026)	Official Record of Electronic Filing Manager (Tyler Technologies / eFileIL)

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Complainant*

8516 W. Winona St., Chicago, Illinois 60656

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

EXHIBIT A

SECOND DISTRICT CLERK JEFFREY H. KAPLAN WRITTEN REFUSAL & NOTICE OF MINISTERIAL

Classification: Official Written Correspondence of Appellate Court Clerk's Office

WHAT THIS EXHIBIT ESTABLISHES

Proves total, official written administrative lockout of complainant personally at the appellate court intake desk.

VISIBLE ON THE FACE OF THE SOURCE

- Email sent Friday, August 14, 2026 at 2:23 PM by Jeffrey H. Kaplan, Clerk of the Court, Illinois Appellate Court, Second District.
- Verbatim statement: 'Unfortunately, since you're represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.'
- Demonstrates clerk-level enforcement of extra-statutory representation filter preventing administrative inquiries.

ADMINISTRATIVE AUDIT RELEVANCE

Direct evidence of the Second District's refusal to accept pro se communications or compliance inquiries.

SOURCE AUTHENTICATION & CONTROL

1. Gmail - RE_ FORMAL NOTICE — No. 2-26-0352 — Envelope 39386845 _ Clerk Rejection _ Litigation Hold — Response Requested Aug. 17.pdf
Complete native record (3 pages) • Classification: Official Written Correspondence of Appellate Court Clerk's Office

SHA-256:
E5B1F946B1AAC54F29640268FF5046F8EB8A3D0A159B7B3349C9C85AA29249D9



Ehab Hilfiger <defcon5ready@gmail.com>

RE: FORMAL NOTICE — No. 2-26-0352 — Envelope 39386845 / Clerk Rejection / Litigation Hold — Response Requested Aug. 17

1 message

Jeffrey Kaplan <jkaplan@illinoiscourts.gov>

Fri, Aug 14, 2026 at 2:23 PM

To: Ehab Hilfiger <defcon5ready@gmail.com>

Cc: "Christopher.McCoy@osad.state.il.us" <Christopher.McCoy@osad.state.il.us>, 2ndDistrict OSAD <2ndDistrict@osad.state.il.us>

Dear Mr. Allababidi,

Unfortunately, since you're represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.

Jeffrey H. Kaplan

Clerk of the Court

Illinois Appellate Court

Second District

[55 Symphony Way](#)[Elgin, IL 60120-5558](#)

(847) 695-3750

From: Ehab Hilfiger <defcon5ready@gmail.com>**Sent:** Thursday, August 13, 2026 4:50 PM**To:** Jeffrey Kaplan <jkaplan@IllinoisCourts.gov>**Cc:** Christopher.McCoy@osad.state.il.us; 2ndDistrict OSAD <2ndDistrict@osad.state.il.us>**Subject:** FORMAL NOTICE — No. 2-26-0352 — Envelope 39386845 / Clerk Rejection / Litigation Hold — Response Requested Aug. 17

Mr. Kaplan:

Attached is my August 13, 2026 **Notice of Ministerial Duty, Demand for the Intake Instruction, and Litigation Hold**, with exhibits, concerning **People v. Allababidi, No. 2-26-0352** and eFileIL **Envelope No. 39386845**.

The issue is narrow and documented.

Envelope No. 39386845 was submitted on **August 6, 2026 at 11:31 a.m. CST**. The Clerk's Office refused it on **August 7, 2026 at 12:15 p.m.** with the complete rejection comment:

"See order of 8/7."

The attached packet preserves the rejection notice, the August 7 order invoked by the rejection, the July 31 order, the relevant docketing materials, and the associated record.

Please treat the **litigation hold in Part VII as effective upon receipt of this transmission** and transmit it to the person responsible for records retention for the Clerk's Office and, to the extent any identified systems are centrally administered, to the appropriate records custodian.

Part VIII requests a written response by **5:00 p.m. Monday, August 17, 2026**, including:

1. whether any intake instruction, flag, direction, protocol, or communication concerning my submissions exists;
2. the identity and title of the person who reviewed and refused Envelope No. 39386845 and anyone consulted;
3. the specific authority relied upon for that refusal;
4. confirmation of the submission/rejection chronology and the Office's position concerning application of the August 7 order to the August 6 submission;
5. the standing intake rule applicable to any future conforming submission requesting leave to file;
6. written confirmation that the litigation hold has been implemented; and
7. whether this letter and exhibits will be placed in the file of No. 2-26-0352 and before the Court, or the specific ground on which the Clerk's Office declines to do so.

I am not asking the Clerk's Office to adjudicate any disputed legal issue or to rule in my favor. I am asking for the identity, authority, instruction, and preservation record underlying an act performed by the Clerk's Office, and for a written answer concerning how conforming submissions will be handled going forward.

The attachment is transmitted as the complete supporting record. Please confirm receipt of the entire PDF and preservation of this email and attachment in native form with associated metadata.

Mr. McCoy and the Second District Office of the State Appellate Defender are copied because OSAD remains appointed counsel in this appeal.

Consistent with the Court's July 31 order, **appellee's counsel is not copied on this transmission**.

Respectfully and without waiver of any right or remedy,

Ehab Allababidi
Pro Se
No. 2-26-0352
defcon5ready@gmail.com

--



Ehab Allababidi

PHONE 773-920-0030

EMAIL defcon5ready@gmail.com

CAGE 16QC7

DarkDeck

LEGAL NOTICE & CONFIDENTIALITY

This email and any attachments may contain confidential, privileged, proprietary, trade-secret, controlled, or otherwise legally protected information intended solely for the named recipient or authorized recipient group. If you received this communication in error, please notify the sender promptly, refrain from reviewing, copying, forwarding, or distributing its contents, and delete all copies within your control.

CUI & SENSITIVE BUSINESS RECORDS: Do not send Controlled Unclassified Information (CUI), controlled government information, export-controlled material, sensitive business records, or other confidential operational data to this Gmail address. Authorized CUI or sensitive business records must be directed to ehab@darkdeck.ai through an approved secure transmission method and only after confirming the applicable handling requirements.

Transmission does not waive any privilege, protection, objection, defense, right, confidentiality interest, or preservation position. No statement in this message creates a binding agreement, admission, waiver, modification, or commitment unless expressly stated and authorized in writing. Any express request, deadline, preservation demand, compliance directive, or recordkeeping instruction contained in the body of the message constitutes written notice and should be retained with the complete native email, attachments, headers, and associated metadata.

EXHIBIT B

FIRST DISTRICT CHIEF DEPUTY CLERK LISA FRANKLIN WRITTEN CORRECTION & DIRECTIVE

Classification: Official Written Correspondence of Appellate Court Clerk's Office

WHAT THIS EXHIBIT ESTABLISHES

Proves administrative admission that rejection of pro se filing was error and confirms right to file pro se.

VISIBLE ON THE FACE OF THE SOURCE

- Email sent August 14, 2026 by Lisa Franklin, Chief Deputy Clerk, Appellate Court, First District.
- Express written admission that the rejection of Envelope No. 39310613 'was done in error.'
- Expressly confirms: 'You currently have the right to file into your case pro-se.'
- Confirms staff were instructed not to reject pro se filings if otherwise in order.

ADMINISTRATIVE AUDIT RELEVANCE

Serves as the benchmark of correct administrative compliance under Ill. S. Ct. R. 9(h).

SOURCE AUTHENTICATION & CONTROL

1. FRANKLIN_EMAIL_AUG14_2026.pdf Complete native record (1 pages) • Classification: Official Written Correspondence of Appellate Court Clerk's Office	SHA-256: 2803411CCCF550650864E2053E7C5FBA9001D59902987DE9D8DDA32194772114
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From: Lisa Franklin <lfranklin@illinoiscourts.gov>
Sent: Friday, August 14, 2026
To: Ehab Hilfiger <defcon5ready@gmail.com>
Cc: 1stDistrict@osad.state.il.us; eserve.criminalappeals@cookcountysao.org
Subject: Re: Case No. 1-26-0055 — Envelope No. 39310613 / Pro Se Submission Status

Dear Mr. Allababidi,

Please be advised that the rejection of your e-filing submission in Envelope No. 39310613 on August 4, 2026, **was done in error**.

You **currently have the right to file into your case pro-se**. Our intake staff have been instructed not to reject your filings if they are otherwise in order.

You are invited to resubmit your motion in a new electronic envelope through the e-filing system, ensuring that proper service is effected upon both the Cook County State's Attorney's Office and the Office of the State Appellate Defender.

Sincerely,

Lisa Franklin

Chief Deputy Clerk
Appellate Court of Illinois, First District
160 N. LaSalle Street, 14th Floor
Chicago, Illinois 60601
(312) 793-5600

EXHIBIT C

OFFICIAL EFILEIL REJECTION NOTICE FOR ENVELOPE NO. 39386845 (AUG. 7, 2026)

Classification: Official Record of Electronic Filing Manager (Tyler Technologies / eFileIL)

WHAT THIS EXHIBIT ESTABLISHES

Demonstrates non-compliance with Reviewing Courts Electronic Filing Rejection Standards.

VISIBLE ON THE FACE OF THE SOURCE

- Date/Time Submitted: 8/6/2026 11:31 AM CST. Date/Time Rejected: 8/7/2026 12:15 PM.
- Rejection Reason: 'Rejection by Clerk.' Rejection Comments: 'See order of 8/7.'
- Failed to specify any statutory standard number, factual explanation, or corrective instructions.

ADMINISTRATIVE AUDIT RELEVANCE

Concrete documentation of non-conforming rejection requiring AOIC compliance intervention.

SOURCE AUTHENTICATION & CONTROL

1. 2D_REJECTION_39386845_2026-08-07.pdf

Complete native record (2 pages) • Classification: Official Record of Electronic Filing Manager (Tyler Technologies / eFileIL)

SHA-256:

2668B0114F3C1837EE6DF9D89A5DB5B3FC0BEAAB67F174F9B5C277C7FB641E7



Filing Rejected for Envelope Number: 39386845 in Case: 2-26-0352, People v. Allababidi, Ehab for filing Motion - Supplement
1 message

<no-reply@efilingmail.tylertech.cloud>
To: ehabhilfiger@gmail.com

Fri, Aug 7, 2026 at 12:15 PM

Filing Rejected



Envelope Number: 39386845
Case Number: 2-26-0352
Case Name: People v. Allababidi, Ehab

The document below has been rejected for the reason(s) stated. Please correct and resubmit. If the corrected document will be late, [Illinois Supreme Court Rule 9](#) permits you to file a motion asking the court to treat the corrected document as filed on the date/time it was originally submitted. If you intend to do so, you must file that motion within 5 court days of this notice.

If you need further information, contact the [court clerk](#).

Rejection Reason(s) from Clerk's Office		
Court		Appellate Court – 2nd District
Rejection Reason		Rejection by Clerk.
Rejection Comments		See order of 8/7

Document Details	
Case Number	2-26-0352
Case Name	People v. Allababidi, Ehab
Date/Time Submitted	8/6/2026 11:31 AM CST
Filing Type	EFileAndServe
Filing Description	Supplement & Declaration re Aug. 6 Proceeding; Renewed Special-Prosecutor Request
Filing Code	Motion - Supplement
Filed By	Ehab Allababidi
Filing Attorney	

To learn how to copy the rejected filing so that you can make changes to refile, [click here](#).

If you are not represented by a lawyer, we want to improve your e-filing experience. Please [click here](#) to fill out a short survey.

SOURCE: eFileIL / Tyler Technologies rejection notice, forwarded August 17, 2026
CASE: People v. Allababidi, No. 2-26-0352
ENVELOPE: 39528818

Filing Rejected
Envelope Number: 39528818
Case Number: 2-26-0352
Case Name: People v. Allababidi, Ehab

The document below has been rejected for the reason(s) stated. Please correct and resubmit. If the corrected document will be late, Illinois Supreme Court Rule 9 permits you to file a motion asking the court to treat the corrected document as filed on the date/time it was originally submitted. If you intend to do so, you must file that motion within 5 court days of this notice.

Rejection Reason(s) from Clerk's Office
Court: Appellate Court - 2nd District
Rejection Reason: Rejection by Clerk.
Rejection Comments: Per the court's order of July 31, "appellant himself shall file nothing further with this court."

Document Details
Date/Time Submitted: 8/14/2026 11:48 PM CST
Filing Description: Verified Emergency Motion to Vacate July 31 Restrictions, for Immediate Rule 609(a) Stay, Warrant Relief, and Rule 607(b) Order
Filing Code: Motion - Stay
Filed By: Ehab Allababidi

The rejection notice directs use of a Rule 9 cure motion while the rejection comment invokes the order that prevents appellant from filing that motion.



EXHIBIT C

Second District order - July 31, 2026

AOIC-SUPP-C

The operative filing blackout: 'appellant himself shall file nothing further with this court.'



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

July 31, 2026

Ehab Allababidi
8516 W. Winona St.
Chicago, IL 60656

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, July 31, 2026, entered the following order in the above entitled case:

Appellant's "omnibus emergency motion" is granted as to its request for the appointment of appellate counsel, and the Office of the State Appellate Defender is hereby appointed. Now having been appointed counsel, appellant himself shall file nothing further with this court and shall not communicate by any means with appellee's counsel. Appellant's "omnibus" motion, and his other pending motions, are otherwise denied without prejudice to any motion filed by his counsel, including a motion to stay. (Appellant's counsel is hereby advised of appellant's suggestion that his jail term will begin on August 6, 2026.) This court reserves any issue of its jurisdiction.

Jeffrey H. Kaplan
Clerk of the Court

cc: Christopher Michael McCoy
Max Christian Boose



EXHIBIT D

Second District order - August 7, 2026

AOIC-SUPP-D

The court maintains appointed counsel over appellant's objection and leaves the July 31 order standing.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

August 7, 2026

Ehab Allababidi
8516 W. Winona St.
Chicago, IL 60656

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, August 07, 2026, entered the following order in the above entitled case:

Appellant's motion for leave to reply is granted. However, appellant's motion to vacate the appointment of counsel, and appellant's counsel's motion to withdraw, are denied.

Appellant clearly made multiple requests for counsel, which this court could grant. Appellant's indigency was established by his application to waive court fees, and thus this court could grant appellant's requests without a remand to the circuit court.

In any event, however, this court could appoint counsel even without appellant's requests, and it can now maintain that appointment over his objection. As appellee notes, appellant has no constitutional right to represent himself. To be sure, Rule 607(a) states that, if an indigent appellant "desires counsel on appeal, the court shall appoint counsel on appeal." But this is a very far cry from stating that the court *may* appoint counsel *only* if the appellant desires counsel.

Here, 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. Accordingly, this court's order of July 31 will stand.

Jeffrey H. Kaplan
Clerk of the Court

cc: Jaime Ling Montgomery



EXHIBIT E

Second District order - August 21, 2026

AOIC-SUPP-E

The court later narrows the no-contact component; the filing blackout remains operative.



ILLINOIS APPELLATE COURT SECOND DISTRICT

55 SYMPHONY WAY
ELGIN, IL 60120
(847) 695-3750

August 21, 2026

Christopher Michael McCoy
Deputy Defender
Office of the State Appellate Defender
One Douglas Avenue, Second Floor
Elgin, IL 60120

RE: People v. Allababidi, Ehab
Appeal No.: 2-26-0352
County: Lake County
Trial Court No.: 23CF1146

The court has this day, August 21, 2026, entered the following order in the above entitled case:

Appellant's motion to modify this court's order of July 31, 2026, is granted, as this court's intent in entering that order was to prohibit communication only with appellee's *appellate* counsel.

Appellant's motion to stay is denied. If this order indeed moots this appeal, appellant may move to dismiss it.

Jeffrey H. Kaplan
Clerk of the Court

cc: Jaime Ling Montgomery
Lake County Circuit Court
Max Christian Boose



EXHIBIT F

People's First Motion for Sanctions - filed August 25, 2026

AOIC-SUPP-F

The pending motion seeks sanctions against appellant personally and states opposing counsel indicated no response would be filed.



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.

THE PEOPLE'S FIRST MOTION FOR SANCTIONS

The People of the State of Illinois, by Eric F. Rinehart, State's Attorney of Lake County, Illinois, through Edward R. Psenicka, Deputy Director, and Max C. Boose, Staff Attorney, State's Attorneys Appellate Prosecutor, respectfully move for sanctions against defendant for violating this Court's Orders.

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 must not either file documents with this Court or "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 while asserting 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. This Court ruled 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." It further referenced the bar on defendant communicating directly with the undersigned office, holding that "this court's order of July 31 will stand."

4. On August 18, 2026, defendant filed a motion to modify order, wherein he did not challenge the prohibition on direct contact with the office of the State's Attorneys Appellate Prosecutor. Def. Mtn. Modify Order, p. 2. On August 21, 2026, this Court granted defendant's motion to modify its July 31, 2026, ruling that "this court's intent in entering that order was to prohibit communication only with appellee's *appellate* counsel." (emphasis in original).

5. On August 23, 2026, defendant directed electronic correspondence to the undersigned office in violation of this Court's unambiguous orders. Defendant included the 2nd District ILSAAP email account in the "To" recipient box, and confirmed the intended recipients in the body of the email: "State's Attorneys Appellate Prosecutor / Lake County State's Attorney." See Def. Aug 23 Email, attached as Exhibit 1. Defendant includes demands for various actions styled as

“administrative returns.” Ex. 1. Defendant explicitly confirms that directing the correspondence to the undersigned office was intentional, stating “Appellate counsel are copied for transparency.” Ex. 1. The email sender is defendant’s address which he has previously listed with this Court as his own, and defendant ends the document with his own name. Ex. 1. Defendant’s attached document lists this appeal’s case name and Second District case number, and demands action for seven responses. Def. Email Attachment, attached as Exhibit 2. The body of the attachment confirms defendant’s intentional communication to the undersigned office, stating “Appellate counsel are copied here for transparency” while also acknowledging this Court’s ruling from August 7, 2026, stating he is “represented in the appeal.” Ex. 2, p. 1. Defendant’s attachment is also consistent with prior correspondence directed to the undersigned office. Ex. 2; Def. July 31, 2026, Letter.

6. The People submit that defendant has violated the plain language of this Court’s Orders, and indicates an intention to continue sending successive correspondence and demands for responses. In light of defendant’s plain refusal to obey this Court’s Orders, the People request such sanctions as this Court deems appropriate to ensure compliance with its Orders.

7. The undersigned has supplied a copy of this motion to opposing counsel for their position. Opposing counsel has indicated they will not file a response.

WHEREFORE, for the foregoing reasons, the People of the State of Illinois respectfully request that this Court enter sanctions against defendant for violating its Orders.

Respectfully submitted,

Eric F. Rinehart
State's Attorney
Lake County
Waukegan, Illinois 60085
(847) 377-3000

Edward R. Psenicka
Deputy Director

By /s/ Max C. Boose
Max C. Boose
Staff Attorney
State's Attorneys
Appellate Prosecutor
2032 Larkin Avenue
Elgin, Illinois 60123
(847) 697-0020
2nndistrict.eserve@ilsaap.org

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

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

From: [2nd District](#)
To: [Max Boose](#); [Edward R. Psenicka](#)
Cc: [Lake County](#)
Subject: Fw: FOLLOW-UP / RECORD LOCK — No. 2-26-0352 — July 30 Hold / Aug. 4 Deadline / Preservation Status Due Aug. 25
Date: Monday, August 24, 2026 9:06:45 AM
Attachments: [SAAP RECORD LOCK AUG23.pdf](#)

Thank you,

Shari Lavick, Administrative Secretary
State's Attorneys Appellate Prosecutor
2032 Larkin Avenue
Elgin, Illinois 60123
(847) 697-0020
2nndistrict.eserve@ilsaap.org

From: Ehab Hilfiger <defcon5ready@gmail.com>
Sent: Sunday, August 23, 2026 8:53 PM
To: 2nd District; statesattorney@lakecountyil.gov
Cc: Christopher.McCoy@osad.state.il.us; Jaime.Montgomery@osad.state.il.us;
2ndDistrict@osad.state.il.us
Subject: FOLLOW-UP / RECORD LOCK — No. 2-26-0352 — July 30 Hold / Aug. 4 Deadline / Preservation Status Due Aug. 25

State's Attorneys Appellate Prosecutor / Lake County State's Attorney:
Attached is a compact follow-up to the July 30 litigation-hold and correction package. I am not resending the 48 pages you already received. The August 4 deadline has expired, and I have not located a written response from either office in the sending mailbox.
Because OSAD now represents me in the appeal, this is not a merits brief and asks no merits concession. It asks for seven verifiable administrative returns only: whether the hold issued; whether any correction/supplement was filed; whether the May 28 and June 17 ECR recordings and access/export logs are preserved; whether the DeRosa tenant-lifecycle records are preserved; whether the June 15 Odyssey/eFile audit trail is preserved; and whether you dispute the identity/authenticity of any source record in the July 30 exhibit register.
A seven-line response is sufficient. Please return it by 5:00 P.M. CDT Tuesday, August 25, 2026. Silence will be recorded only as no response located by the deadline, not as agreement or admission.
Appellate counsel are copied for transparency.
Respectfully and without waiver,
Ehab Allababidi



FOLLOW-UP / RECORD LOCK

People v. Allababidi - Appeal No. 2-26-0352

RE: July 30 litigation hold and correction demand | August 4 deadline expired | preservation and docket-status return only

WRITTEN RESPONSE REQUESTED BY 5:00 P.M. CDT TUESDAY, AUGUST 25, 2026

The original 48-page package is not reattached. You already received it. This follow-up asks for the small set of binary or docket-identifiable answers that remain independently verifiable after the August 4 deadline.

I. THE PURPOSE OF THIS FOLLOW-UP

The July 30 letter separated legal disagreement from preservation and correction. It identified the exact rule texts, the exact paragraphs challenged, the May 28 and June 17 ECR records, the DeRosa recipient-status chronology, and the docket-entry audit issue. Its response deadline passed on August 4. I have not located a written response from the State's Attorneys Appellate Prosecutor or the Lake County State's Attorney in the sending mailbox. This letter does not repeat the merits argument. It locks the post-notice record.

The Illinois Appellate Court has since denied the requested stay of sentence while granting counsel's motion to modify the July 31 order. Appellate counsel are copied here for transparency. Because I am represented in the appeal, this transmission is limited to preservation, correction-status identification, and administrative record ownership; it is not an attempt to brief the merits outside counsel.

II. SEVEN RETURNS THAT RESOLVE THE ADMINISTRATIVE RECORD

#	RETURN	EXACT QUESTION
1	Litigation hold	Was the July 30 preservation hold issued? If yes, identify by title the person/unit responsible. If no, state no.
2	Filed correction	Did the People file any correction, supplement, withdrawal, or amended position responsive to the July 30 notice? Identify title/date or state none.
3	May 28 ECR	Confirm whether the May 28, 2026 Courtroom 611 electronic recording and access/export logs are preserved.
4	June 17 ECR	Confirm whether the June 17, 2026 Courtroom 611 electronic recording and access/export logs are preserved.
5	DeRosa tenant records	Confirm preservation of recipient-object lifecycle, alias/proxy, mailbox/retention, message-trace, and audit records for fderosa@lakecountyil.gov for June 1-July 30, 2026.
6	Odyssey/eFile audit	Confirm preservation of audit history for the June 15, 2026 entry displayed publicly as "Correspondence," including document-type assignment and actor identity.
7	Source dispute	If you dispute the identity/authenticity of any source record listed in the July 30 enclosure register, identify the exhibit letter and the specific basis. Otherwise state no source-identification dispute.

III. WHAT THIS LETTER DELIBERATELY DOES NOT DO

It does not demand a concession on the stay, jurisdiction, or merits. It does not condition any disciplinary or agency submission on settlement or corrective action. It does not assert that any person destroyed evidence. It does not ask a represented party's adversary to bypass appellate counsel. It asks whether preservation happened and whether any correction was filed after notice. Those facts are either true or false on fixed dates.



IV. WHY THE ORIGINAL PACKET IS NOT REATTACHED

The July 30 letter itself made the point: padding a follow-up with paper the recipient already possesses is how a record gets skimmed. The original package remains the operative notice. This follow-up is a receipt-and-status instrument. If your office needs the original retransmitted for administrative reasons, say so and I will send the identical preserved copy, not a rewritten substitute.

V. DEADLINE AND RESPONSE FORM

A seven-line response keyed to items 1-7 is sufficient. Please return it by **5:00 P.M. CDT Tuesday, August 25, 2026**. Silence will be recorded only as no response located by the deadline, not as agreement, admission, or waiver.

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



No. 2-26-0352

E-FILED
Transaction ID: 2-26-0352
File Date: 8/25/2026 11:04 AM

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

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.

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 the People's motion for sanctions in the above-entitled cause is being electronically filed with the Clerk of the Appellate Court, Second District, on August 25, 2026. Upon acceptance of the filing from this Court, the party listed above will be served using the court's electronic filing system.

/s/ Luisa Gonzalez
Luisa Gonzalez, Legal Secretary
State's Attorneys Appellate Prosecutor
2032 Larkin Avenue
Elgin, Illinois 60123
(847) 697-0020
2nndistrict.eserve@ilsaap.org

SOURCE: Email from Christopher McCoy, Deputy Defender, OSAD Second Judicial District
DATE: August 27, 2026
SUBJECT: Re: Appeal No. 2-26-0352 - Immediate Response Required to People's First Motion for Sanctions
TO: Ehab Hilfiger

Mr. Allababidi:

I will not be filing a response to the State's motion for sanctions because I do not believe there is any meritorious response to make. The Appellate Court's order clearly prohibited you communicating with the appellate prosecutor's office. It did not make an exception for communications that were not an official filing nor was there an exception for communications in which our office was cc'ed on the email nor was there an exception for doing it only one time. As the order was clearly violated, there is nothing I can say in response to the State's motion.

Second, I will not be filing a motion for limited remand because I do not see a benefit to you from this motion. If we were able to get the case remanded to the trial court and the court did quash the warrant, the fact is that your jail sentence still is not stayed pending appeal. In short, since our motion to stay was vacated, it does not matter if the warrant is recalled or not.

[Remaining email omitted from this exhibit as unnecessary to the administrative intake issue.]

SOURCE: Email from Jeffrey H. Kaplan, Clerk of the Illinois Appellate Court, Second District
DATE: August 14, 2026, 2:23 PM
SUBJECT: RE: FORMAL NOTICE - No. 2-26-0352 - Envelope 39386845 / Clerk Rejection / Litigation Hold - Response Requested Aug. 17
TO: Ehab Hilfiger
CC: Christopher.McCoy@osad.state.il.us; 2ndDistrict@osad.state.il.us

Dear Mr. Allababidi,

Unfortunately, since you're represented by counsel, only your counsel is permitted to make requests of the court or my office on your behalf.

Jeffrey H. Kaplan
Clerk of the Court
Illinois Appellate Court
Second District
55 Symphony Way
Elgin, IL 60120-5558
(847) 695-3750