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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

EHAB ALLABABIDI,
Plaintiff, Pro Se,

v.

CITY OF PARK RIDGE, ILLINOIS,
Defendant.

IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT,
CHANCERY DIVISION

No. 2025 CH 12908

Calendar 5

The Honorable **Neil H. Cohen,**
Judge Presiding

Next setting: **September 2, 2026**

**EMERGENCY MOTION FOR ENTRY OF WRITTEN ORDER OF RECORD, FOR
A RULE 45 FINDING CONCERNING THE SEPTEMBER 2, 2026 APPEARANCE,
AND FOR AN EXPEDITED SETTING ON CHANGED CIRCUMSTANCES**

*Ill. S. Ct. R. 45 and R. 271 · Ill. R. Prof. Conduct 1.7(a)(2) and 1.10 · verified supporting exhibits filed herewith · Filed
pro se, August 14, 2026*

This motion does not ask the Court to reconsider the finding of August 12, 2026, and does not contend that it was wrong. It asks for something the movant cannot obtain any other way: a written order, entered of record, disposing of his emergency application. He is presently unable to seek review of a disposition that exists in an e-mail and nowhere else, and he respectfully submits that the remedy for that is an order — including an order against him.

Plaintiff EHAB ALLABABIDI, pro se, moves this Court for the relief set out in Part VI. Every factual statement below is a quotation from a document in the supporting record or a date. The movant asks the Court to notice at the outset what he does **not** say: he does not say the Court erred; he does not say chambers acted improperly; he does not ask for any finding against the Court, its staff, or opposing counsel in this motion. He asks for a piece of paper and for an answer to three questions.

I. What happened after the Court's finding, and only that

On August 12, 2026 at 1:57 p.m., chambers transmitted the following by electronic mail:

The Court finds no present emergency in the unfiled Motion provided in the email below.
Allababidi v. City of Park Ridge is next up on September 2, 2026, at 9:30 AM. Parties may attend
in person in Courtroom 2308 in the Daley Center or via Zoom.

Harrison R. Powell, Judicial Law Clerk to the Honorable Neil H. Cohen — August 12, 2026, 1:57 p.m. (Ex. PR-A.)

The movant accepts that finding as the Court's assessment of the record then before it. The record then before it is Exhibit PR-F, his e-mail of August 11. He asks the Court to compare the two exhibits and satisfy itself that the following is accurate: **as of 1:57 p.m. on August 12, 2026, no attempt had been made to**

1 **execute any arrest warrant against him, and nothing before the Court suggested that one was imminent.**

2 The next day, at approximately 3:00 p.m., officers came to the door of his residence at 8516 West Winona
3 Street and asked for him by name. He was not there. The declaration at Exhibit PR-B states that on information
4 and names its source; states that the doorbell camera was not charged and that **no recording exists. The
warrant is the subject of this motion. The officers who acted on it are not.**

5 That is the entire factual basis of this motion, and the movant is deliberate about keeping it that small. He
6 is not re-arguing the disqualification motion. **A finding that no emergency exists is a finding about a state of
affairs, and the state of affairs changed the following afternoon.** Section 2-1301 of the Code and this Court's
7 inherent authority over its own interlocutory orders permit it to revisit such a finding at any time before final
8 judgment, and changed circumstances are the ordinary occasion for doing so.

9 **II. Why the movant asks for an order rather than for relief**

10 The movant states the following as a proposition of Illinois law and not as a criticism of any person. **A
court of record speaks through the written orders it enters.** The correspondence of chambers, however clear
11 and however plainly it reflects the Court's view, is not an order; it is not signed by the judge, it is not
12 file-stamped, and it does not appear on the docket. Illinois Supreme Court Rule 271 addresses this directly. It is
13 titled "**Orders on Motions**" and it provides: "**When the court rules upon a motion other than in the course
of trial, the attorney for the prevailing party shall prepare and present to the court the order or
judgment to be entered, unless the court directs otherwise.**" The rule presupposes what this cause presently
14 lacks: that a ruling on a motion produces **an order to be entered.** No party prevailed on the record here because
15 no order was presented and none was entered. The movant tenders one with this motion (Document 02) so that
the omission cannot be laid at his door.

16 The consequence is not academic, and the movant sets it out plainly because it is the reason this motion
17 exists:

- 18 **1. He cannot move to reconsider it.** A motion to reconsider is directed at an order. There is no order.
- 19 **2. He cannot appeal it.** Rule 307 and Rule 304(b) alike presuppose an entered order.
- 20 **3. Supervisory relief is materially impaired.** Rule 383 requires a petition to be supported by
21 lower-court records or other authenticated material sufficient to present the issue fully. An entered
22 order would fix what was decided, when, and by whom; correspondence leaves each of those open to
argument in any reviewing court.
- 23 **4. He cannot comply with it in any provable way,** because there is nothing of record for a reviewing
court, a later judge of this Court, or any other tribunal to read.

24 So the emergency application has been effectively denied and is simultaneously beyond the reach of
25 every mechanism the law provides for testing a denial. The movant does not suggest that anyone designed that
26 result; it is a byproduct of the convenience of e-mail, and it happens every day in every division. **He suggests
only that the cure is a one-line order, and that he is entitled to ask for it.**

27 Exhibit PR-G is furnished to show the Court, from a different court's file, what the mechanism costs a
28 litigant when it is allowed to run. A document he submitted in his criminal appeal on August 6 was disposed of

at an intake desk on August 7 with a five-word comment. No order was entered, and as of this filing none appears on that docket. There is nothing there to appeal from, to reconsider, or to attach to anything. He furnishes it because he is preventing the same silence from settling over this cause, and because he would rather be denied on the record than prevail in correspondence.

III. September 2, 2026, and the condition in the order of August 11

The order entered August 11, 2026 — prepared by counsel for the defendant and transmitted to chambers at 10:58 a.m. that day (Ex. PR-A) — provides for dismissal of this cause for want of prosecution in the event the plaintiff does not appear on September 2, 2026. The movant does not here challenge that condition, and Part VI asks for no relief against it beyond a finding as to how it operates.

He asks the Court to hold two facts side by side, both of which are in the supporting record:

WHAT THE ORDER REQUIRES OF THE PLAINTIFF	WHAT IS TRUE OF THE PLAINTIFF WHEN HE DOES IT
The order of August 11, 2026 conditions the survival of this cause on the plaintiff’s appearance on September 2, 2026, failing which the cause may be dismissed for want of prosecution.	An arrest warrant for the plaintiff has been outstanding since May 28, 2026 , and on August 13, 2026 at approximately 3:00 p.m. officers came to his home on it. (Exs. PR-B, PR-C.)
Courtroom 2308 is in the Richard J. Daley Center, which is secured and staffed by the Sheriff of Cook County, through whose screening every person entering must pass.	The plaintiff is the subject of a live warrant entry in LEADS and NCIC bearing his name, date of birth, and home address. (Ex. PR-C.)

The movant states the difficulty without dramatizing it. If personal appearance is required on September 2, 2026, then the order conditions the survival of his lawsuit on his entering a guarded public building while a warrant for his arrest is live. If he stays away, the cause may be dismissed. **He is not asking this Court to excuse him from appearing.** He is asking it to say which of those two things it actually means, because he cannot plan around a condition whose terms he is guessing at, and because guessing wrong forfeits either his liberty or his case.

That collision is resolved by rule, and the movant states the rule before he states the consequence. Illinois Supreme Court Rule 45, as amended December 2, 2025 and effective March 1, 2026, governs remote appearances in circuit court proceedings. Three of its provisions dispose of the question:

Except as otherwise specifically provided in this rule, **a remote appearance or court proceeding shall be equivalent to an in-person appearance or court proceeding for all purposes.**

Ill. S. Ct. R. 45(a)(1).

Rule 45(a)(4)(i) defines “Civil Matters” by case type and the list begins: “Arbitration (AR), **Chancery (CH)**, Eminent Domain (ED) ...” This cause is a Chancery matter. Rule 45(c)(1) then provides:

Case participants shall be permitted to attend court via the circuit court’s available remote appearance technology without any advance approval, except for the following proceeding types, which shall require the approval of the judge presiding over the matter: (i) Evidentiary hearings ...; (ii) Settlement conferences; (iii) Bench trials; (iv) Jury trials; and (v) Any case type or proceeding type exempted from remote participation in accordance with paragraphs (b)(2) and (b)(7).

Ill. S. Ct. R. 45(c)(1).

The setting of September 2, 2026 is a status. **It is not an evidentiary hearing, a settlement conference, a bench trial, or a jury trial.** Unless it falls within a local exemption adopted by the Chief Judge under Rule 45(b)(2) and (b)(7), the movant is **permitted** to attend remotely without advance approval, and his remote attendance is equivalent to physical attendance **for all purposes** — which necessarily includes the purpose of appearing when a case is called. A litigant who appears within the meaning of Rule 45 has appeared. He has not failed to prosecute.

Rule 45(b)(1) supplies the only route to a different result, and it supplies its own procedure:

A judge presiding over a case in which the option to appear remotely without any advance approval is permitted may, in the exercise of the judge’s discretion, require a case participant to attend a court proceeding in person for reasons particular to the specific case ... When exercising such discretion, **the judge shall inform case participants on the record if they are required to attend a future court proceeding in person.**

Ill. S. Ct. R. 45(b)(1).

No such direction has been given on the record in this cause. What the record contains is the opposite: chambers advised the parties on August 12 that they “may attend in person in Courtroom 2308 in the Daley Center or via Zoom.” (Ex. PR-A.) The movant therefore asks for the narrowest thing that ends the collision — confirmation in an entered order that his Rule 45 remote appearance on September 2, 2026 satisfies the appearance condition; or, if physical presence is required, a case-specific directive stating that requirement on the record, as Rule 45(b)(1) itself requires. **Either answer is lawful and either answer is enough. What cannot continue is the absence of both.**

IV. Three questions, each answerable in a word

The movant asks the Court to answer the following in its written order. He has framed each so that it can be answered without any exercise of discretion he is not entitled to ask for, and so that an answer adverse to him is as easy to give as a favorable one:

Question 1	Does the setting of September 2, 2026 require the plaintiff’s personal, physical appearance, or is appearance by Zoom sufficient? <i>(Yes / No / Zoom sufficient.)</i>
Question 2	If the plaintiff appears by Zoom on September 2, 2026, will the cause be subject to dismissal for want of prosecution on the ground of non-appearance? <i>(Yes / No.)</i>
Question 3	Is the Emergency Motion to Disqualify Ancel Glink, P.C., submitted August 11, 2026, denied, continued to September 2, 2026, or set for hearing? <i>(One of the three.)</i>

The movant respectfully submits that he is entitled to know the answer to each, that each can be given in a word, and that none of them requires the Court to decide anything it has not already decided. The purpose of asking them in a motion rather than in correspondence is that the answers will then exist in a form he can rely on and, if necessary, ask a higher court to review.

V. Rules 1.7(a)(2) and 1.10, and what the Court is actually asked to do

The movant will not re-argue the disqualification motion here; it is on file. He states the mechanism, because Question 3 cannot be understood without it, and because the mechanism is narrower and more testable than the impression the underlying motion may have left.

Illinois Rule of Professional Conduct 1.7(a)(2) provides that a concurrent conflict of interest exists where **there is a significant risk that the representation of one or more clients will be materially limited by the lawyer's responsibilities to another client, a former client or a third person, or by a personal interest of the lawyer.** The comments to the Rule direct attention to whether the conflict will **foreclose courses of action that reasonably should be pursued** on behalf of the client. Rule 1.10 ordinarily imputes such a conflict to every lawyer in the firm.

The predicates the movant can establish from this record are these, and no more:

1. An active warrant, issued May 28, 2026, publishes the movant's name, date of birth, and home address, and officers acted on it at that address on August 13, 2026. (Exs. PR-B, PR-C.)
2. **The record has been identified to the movant as maintained under ORI IL0492900, the Lincolnshire Police Department, and he has requested authoritative confirmation of the entering and maintaining agency from the Illinois State Police.** (Ex. PR-D.) He does not ask this Court to treat his own records request as proof of agency ownership, and it is not offered as proof of it.
3. **Adam B. Simon** is the Village Attorney of Lincolnshire and a partner of **Ancel Glink, P.C.**, which appears in this cause for the defendant and is copied on every message in Exhibit PR-A.
4. Defense counsel prepared and transmitted the proposed order, at 10:58 a.m. on August 11, 2026, containing the dismissal-for-want-of-prosecution condition later entered by the Court. (Ex. PR-A.)

The movant does not ask this Court to infer a conflict from the existence of that relationship. A firm may sponsor a village event, appear for one municipality, and litigate against a private party without any of it mattering. The question Rule 1.7(a)(2) actually poses is operational, and it is this: **does the zealous representation of the defendant in this cause now reasonably require Ancel Glink to investigate, subpoena, seek evidence from, attribute responsibility to, or take a litigation position adverse to the Village of Lincolnshire or its Police Department concerning the warrant record** — while the firm, through a partner, concurrently owes professional duties to that Village? If the answer is yes, the conflict is not an appearance of impropriety. It is the foreclosure of a course of action that reasonably should be pursued, which is the precise harm the Rule addresses.

That question cannot be answered on the present record, and the movant does not pretend otherwise. It requires three facts he does not have and cannot obtain himself. Paragraph 5 of Part VI therefore asks only for a threshold verified disclosure, and asks that anything counsel regards as privileged be tendered **in camera** rather than filed:

1. Whether the Village of Lincolnshire, or its Police Department, is **presently a client** of Ancel Glink, P.C., and the scope and dates of that relationship insofar as it bears on this subject matter;
2. Whether counsel performed the analysis Rule 1.7 requires after the warrant record became material in this cause, and when;
3. Whether any informed consent, confirmed in writing, exists under Rule 1.7(b)(4).

The disqualification motion has been pending since August 11 with no written disposition. **Question 3 asks for one.** The movant does not ask this Court to grant that motion in this instrument, and paragraph 5 is

expressly severable from every other paragraph: the Court can resolve the September 2 collision under Rule 45 today and take the conflict question up on a developed record whenever it chooses.

VI. Relief requested

WHEREFORE, Plaintiff EHAB ALLABABIDI respectfully requests that this Court:

1. **CONFIRM**, under Ill. S. Ct. R. 45(a)(1), (a)(4)(i) and (c)(1), that the plaintiff may appear remotely at the setting of September 2, 2026 without advance approval, and that such appearance is equivalent to an in-person appearance for all purposes and satisfies any appearance condition — **or**, if physical presence is required, ENTER a case-specific directive to that effect on the record as Rule 45(b)(1) provides.
2. **ORDER** that the cause shall not be dismissed for want of prosecution on the ground of non-appearance where the plaintiff appears remotely in conformity with Rule 45.
3. **ENTER A WRITTEN ORDER OF RECORD**, signed and file-stamped, disposing of the emergency application presented August 11, 2026 — granting it, denying it, continuing it, or setting it. **The plaintiff does not ask that the order be in his favor.** A proposed order is tendered herewith under Ill. S. Ct. R. 271.
4. **SET or CONTINUE** the Emergency Motion to Disqualify Ancel Glink, P.C. to a date certain, so that its pendency is a matter of record rather than of correspondence.
5. **DIRECT**, as a threshold matter and severable from every paragraph above, that counsel of record furnish a verified disclosure stating (i) whether the Village of Lincolnshire or its Police Department is presently a client of Ancel Glink, P.C. and the scope and dates of that relationship bearing on this subject matter, (ii) whether the analysis required by Ill. R. Prof. Conduct 1.7 was performed after the warrant record became material and when, and (iii) whether informed consent confirmed in writing exists under Rule 1.7(b)(4) — any portion counsel regards as privileged to be tendered **in camera** rather than filed.
6. **GRANT** such other relief as is just.

The movant closes with the sentence he would most like the Court to hold him to. **He is not asking to win anything in this motion.** He is asking for the ordinary work-product of a court of record — a written order — because without one he has no way to comply, no way to seek review, and no way to prove to any other tribunal what was decided here or when. If the answer to every question in Part IV is against him, he asks only that it be against him in writing, on the docket, over the Court's signature, and dated.

Verification

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I certify that the statements set forth in this instrument are true and correct, except as to matters stated on information and belief, and as to those matters I certify that I verily believe them to be true. Every description of a record in this instrument is drawn from the document identified for it in the verified supporting exhibits filed herewith.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI

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Dated: August 14, 2026