

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EHAB ALLABABIDI,
Petitioner,

v.

MATT JUNKIN, Adult Probation Officer,
Lake County Adult Probation Department,
Respondent.

Case No.: **1:26-cv-01077**

Judge: *Hon. John Robert Blakey*

**PETITIONER'S MOTION FOR LEAVE TO
SUPPLEMENT THE PENDING RULE
60(b) MOTION WITH NEWLY
DISCOVERED EVIDENCE OF STATE
COURT SPOILIATION**

Pursuant to Fed. R. Civ. P. 15(d) and this Court's inherent authority, Petitioner Ehab Allababidi respectfully moves this Court for leave to supplement his pending Rule 60(b) Motion for Relief from the May 29, 2026 Abstention Order (Dkt. 36) with newly discovered, time-stamped documentary evidence of database spoliation, record fabrication, and secret ex parte custodial stay revocation committed by state court actors. In support of this Motion, Petitioner states as follows:

1. On June 17, 2026, Petitioner filed his Motion for Leave to File a Rule 60(b) Motion (Dkt. 36) documenting that the state court forum was closed to his defenses because the Clerk refused to docket his pro se post-conviction petition and the state judge locked him out of a remote Zoom hearing, leaving a zero-bond warrant standing.

2. On June 19, 2026, Petitioner discovered that state court actors actively spoliated electronic dockets and executed custodial orders in secret. Specifically: (a) on June 19, the Clerk executed an Unauthorized Manual Status Override of the electronic docket ledger to backdate Petitioner's post-conviction filings to June 15, attempting to retroactively sanitize the June 17 lockout; (b) on June 18, the Clerk docketed an order signed by the judge on June 17 lifting the stay of a 180-day jail term, which was concealed from the public ledger for 24 hours to prevent federal habeas intervention. These acts were committed in direct defiance of a formal email litigation hold served on June 17 at 10:44 p.m.

3. Good cause exists to supplement the record because this new evidence did not exist when the Rule 60(b) motion was prepared on June 17, and it directly refutes the state's defense of comity. The electronic spoliation and ex parte stay execution confirm that the state forum is not merely closed, but actively manipulated to insulate judicial misconduct, excusing exhaustion under 28 U.S.C. § 2254(b)(1)(B)(ii). Supplementing the record ensures the Court decides the pending motion on a complete, truthful record of state actions.

WHEREFORE, Petitioner respectfully requests that this Court grant leave to supplement the pending Rule 60(b) Motion with the attached Supplement and exhibits, take judicial notice of the new

1 spoliation evidence, and grant the relief requested in the pending Motion.

2
3 Respectfully submitted,

4 /s/ Ehab Allababidi

5 **EHAB ALLABABIDI**, *Pro Se* Petitioner

6 8516 W. Winona St., Chicago, IL 60656

7 (773) 920-0030 | defcon5ready@gmail.com

8 Dated: June 19, 2026

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EHAB ALLABABIDI,
Petitioner,

v.

MATT JUNKIN, Adult Probation Officer,
Lake County Adult Probation Department,
Respondent.

Case No.: **1:26-cv-01077**

Judge: *Hon. John Robert Blakey*

PETITIONER'S SUPPLEMENT TO THE
PENDING RULE 60(b) MOTION FOR
RELIEF FROM THE MAY 29, 2026
ABSTENTION ORDER

I. INTRODUCTION & SUMMARY OF NEW EVIDENCE

Petitioner Ehab Allababidi submits this Supplement to place of record time-stamped, objective evidence of bad-faith record fabrication and custodial stay execution discovered on June 19, 2026. This supplement documents two severe, post-filing constitutional deprivations. First, the Lake County Circuit Clerk executed a retroactive, manual alteration of the electronic docket ledger to backdate Petitioner's post-conviction filings to "June 15, 2026." This backdating is a physical and electronic impossibility, designed to conceal the June 17 remote lockout. Second, the state court entered a concealed 180-day custodial execution order signed on June 17 but withheld from the public ledger until June 18, executing an ex parte deprivation of liberty and an unconstitutional "Pocket Warrant." These records, generated in direct defiance of a formal litigation hold served on June 17 at 10:44 p.m., prove that the state corrective process is a closed, bad-faith trap, excusing exhaustion under 28 U.S.C. § 2254(b)(1)(B)(ii).

**II. THE BACKEND ELECTRONIC SPOILIATION: UNAUTHORIZED LEDGER
TIMESTAMP MANIPULATION**

The Lake County Online Portal Case Action Page printed on June 19, 2026 (**Exhibit A**) displays a "Correspondence" entry representing Petitioner's 82-page Omnibus Post-Conviction filing as filed on June 15, 2026. This entry is a retroactive fabrication. The physical and digital records forensically disprove that any filing could have occurred on that date:

1. The Independent USPS Forensic Timeline: Petitioner does not allege that state actors interfered with the United States Postal Service. To the contrary, the routine bureaucratic stalling of the physical package at the Palatine, IL distribution center on June 9, 2026 (Exhibit C), serves as the independent, neutral forensic variable. Because the USPS tracking data incontrovertibly proves the physical document was geographically air-gapped from the Lake County courthouse on June 15, the Clerk's Office could not have received or scanned a physical copy on that date. Therefore, the sudden appearance of the 82-page filing on the official docket with a "June 15" timestamp proves that court

1 personnel bypassed the physical intake process entirely, retrieved the exact digital submission they had
2 rejected on June 8 (Dkt. 36, Ex. C), and manually forced it onto the public ledger on June 19. The
3 USPS delay is the mathematical proof that the fabrication occurred.

4 **2. The Backend Administrative Override:** Because the physical mail never arrived, the
5 retroactive "June 15" docket entry proves that Lake County administrative personnel utilized backend,
6 credentialed access to the eFileIL database to execute an **Unauthorized Manual Status Override of**
7 **an Electronic Ledger**. By docketing this resurrected file without an attorney's signature, the Clerk's
8 Office has admitted that their June 8 rejection—which claimed the file could not be docketed without
9 an attorney's signature—was a bad-faith blockade. The backdating was executed to retroactively
10 fabricate a false timeline of due process, attempting to insulate Judge Stride from the Zoom lockout by
11 making it appear he possessed the filings for 48 hours prior to the hearing.

12 **3. Ministerial Record Manipulations Preclude Immunity:** The defendants cannot claim
13 quasi-judicial immunity for database overrides and ledger alterations. Under *Antoine v. Byers &*
14 *Anderson, Inc.*, 508 U.S. 429, 435–37 (1993) and *Snyder v. Nolen*, 380 F.3d 279, 284 (7th Cir. 2004),
15 the entry of filing dates on a docket ledger is a purely ministerial, mandatory duty, not a discretionary
16 judicial function. Court clerks who manipulate the docketing process or enter retroactive records are
17 stripped of absolute quasi-judicial immunity. *Loubser v. Thacker*, 440 F.3d 439, 442 (7th Cir. 2006). To
18 the extent the manual override was directed by the judge, that directive was a purely administrative task
19 stripped of absolute judicial immunity under *Forrester v. White*, 484 U.S. 219, 229 (1988).

18 **III. THE EX PARTE CUSTODIAL REVOCATION AND THE** 19 **UNCONSTITUTIONAL POCKET WARRANT**

20 The manual docket manipulation was executed to sanitize a severe, secret deprivation of liberty.
21 On June 18, 2026, the Clerk entered an order signed by Judge Stride on June 17 (**Exhibit B**) stating:
22 “The stay of the 180 day Lake County Jail term of the defendant’s sentence is hereby lifted”. This ex
23 parte order was signed during the active Zoom lockout on the morning of June 17, and was concealed
24 from the public ledger for 24 hours:

25 **1. The Secret Ex Parte Execution:** While Judge Stride was actively holding Petitioner in the
26 Zoom waiting room on June 17 and declaring his appearance a "nullity" (Dkt. 36, Ex. H), he was
27 simultaneously executing a custodial jail order off-camera. Under *In re Oliver*, 333 U.S. 257, 273
28 (1948), secret proceedings are constitutionally prohibited. Bypassing the entire adjudicatory
phase—revoking a stayed jail sentence at a preliminary arraignment without a hearing, notice, or
counsel present—violates the Fourteenth Amendment. *Gagnon v. Scarpelli*, 411 U.S. 778, 781–86

(1973); 730 ILCS 5/5-6-4. Furthermore, because the court's own backdated record dictates that Petitioner's *Faretta* invocation was active on June 15, Judge Stride lacked jurisdiction to execute a custodial order on June 17 without conducting a *Faretta* colloquy, rendering the order void *ab initio* for clear absence of jurisdiction. *Mireles v. Waco*, 502 U.S. 9, 11–12 (1991).

2. The 24-Hour Concealment Delta: By signing the jail order on June 17 but withholding its entry onto the public docket until June 18 at 10:48 a.m. (Exhibit B), the state court manufactured a **Concealed Custodial Instrument**. This deliberate withholding broke the chain of custody and prevented Petitioner from filing an emergency appellate stay. Under *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950), due process requires notice. Deliberately holding a signed custodial order off the public docket to evade judicial review is an actionable due process violation completely stripped of absolute quasi-judicial immunity. *Lowe v. Letsinger*, 772 F.2d 308, 313 (7th Cir. 1985).

3. Entry of the Custodial Order Post-Substitution Notice: Even if the stay lift order was signed on June 17, it was not entered on the public ledger until June 18, 2026, at 10:48 a.m. (Exhibit B). Prior to its entry, between 4:20 a.m. and 5:10 a.m. on June 18, 2026, Petitioner successfully transmitted and served his Omnibus Verified Motion for Substitution of Judge for Cause (**Exhibit E**) via facsimile on the Chief Judge, the State's Attorney, and the Clerk's Office (**Exhibit F**). Under 725 ILCS 5/114-5(d), the presentation of a motion for substitution of judge for cause immediately divests the named judge of jurisdiction to enter any substantive rulings. By proceeding to enter and docket the stay lift order at 10:48 a.m.—over five hours after receiving formal, written notice of the substitution motion—state actors acted in clear absence of all jurisdiction, rendering the resulting custody order void *ab initio*. *People v. Brim*, 241 Ill. App. 3d 245, 249 (4th Dist. 1993); *Stump v. Sparkman*, 435 U.S. 349, 356–57 (1978).

IV. DEFYING THE LITIGATION HOLD: WILLFUL SPOILIATION OF ELECTRONIC RECORDS

The timing of the manual docket override confirms it was a willful, sanctionable act of spoliation. On the evening of June 17, 2026, at 10:44 p.m., Petitioner served a formal, written ESI Preservation Demand and Litigation Hold via email (**Exhibit D**) on the Circuit Clerk, shorthand reporters, prosecutor, and Judge Stride. This litigation hold demanded the preservation of Courtroom T-611 Zoom audio/video feeds, Zoom participant logs, and all electronic database transactional records.

Despite this notice, the Clerk's Office executed the manual docket alteration on June 19, 2026. The retroactive alteration of public electronic records in anticipation of federal oversight violates 18 U.S.C. § 1519. Because this manual override constitutes an intentional modification of ESI subject to a

1 preservation duty, it triggers the mandatory adverse inference provisions of **Fed. R. Civ. P. 37(e)(2)**.
2 This Court must presume that the original, un-manipulated electronic record was favorable to Petitioner
3 (confirming the lockout and the absence of a docketed June 15 entry), and that the backdating was
4 executed in bad faith to cover up judicial misconduct.

5 **V. EXHAUSTION IS STATUTORILY EXCUSED: THE STATE CORRECTIVE**
6 **PROCESS IS LACKING**

7 Under 28 U.S.C. § 2254(b)(1)(B)(ii), the requirement to exhaust state remedies is excused where
8 "circumstances exist that render such process ineffective to protect the rights of the applicant." Federal
9 courts have no discretion to abstain under *Younger v. Harris*, 401 U.S. 37 (1971) when the state forum
10 is structurally inadequate. A state court forum that actively manipulates its public database ledgers,
11 conducts ex parte custodial revocations during virtual lockouts, and conceals its jail orders is incapable
12 of providing an adequate opportunity to raise federal defenses. *Middlesex County Ethics Comm. v.*
13 *Garden State Bar Ass'n*, 457 U.S. 423, 432 (1982). Because the state corrective process has been shown
14 to be an active instrument of bad-faith record fabrication, comity yields and immediate federal habeas
15 review is mandated. *Duckworth v. Serrano*, 454 U.S. 1, 3 (1981); *Lane v. Richards*, 957 F.2d 363, 365
16 (7th Cir. 1992).

17 Furthermore, under 42 U.S.C. § 1983, judicial immunity does not bar prospective injunctive relief
18 where, as here, the ex parte, off-the-record nature of the custodial execution rendered declaratory relief
19 inherently unavailable prior to the deprivation. This Court has the authority and the statutory obligation
20 to intervene and stay the execution of the void state order.

21 **WHEREFORE**, Petitioner respectfully requests that this Court grant leave to supplement the
22 pending Rule 60(b) record; take judicial notice of the new spoliation evidence; enter an order certifying
23 under 28 U.S.C. § 2254(b)(1)(B)(ii) that state corrective processes are unavailable and ineffective;
24 vacate the May 29, 2026 stay order; and grant an immediate, stay of the execution of the void 180-day
25 jail term.

26 Respectfully submitted,

27 /s/ Ehab Allababidi

28 **EHAB ALLABABIDI**, *Pro Se* Petitioner
8516 W. Winona St., Chicago, IL 60656
(773) 920-0030 | defcon5ready@gmail.com
Dated: June 19, 2026

VERIFICATION. I, Ehab Allababidi, declare under penalty of perjury under the laws of the
United States (28 U.S.C. § 1746) that the factual statements in this Supplement are true and correct to

1 the best of my knowledge.
2

3 **CERTIFICATE OF FILING AND SERVICE**

4 I, EHAB ALLABABIDI, certify under penalty of perjury that on June 19, 2026, I caused the foregoing
5 *Petitioner's Motion for Leave to Supplement Pending Rule 60(b) Motion with Newly Discovered Evidence of*
6 *Spoliation* and the accompanying Supplement to be filed with the Clerk of the United States District Court for the
7 Northern District of Illinois via the Court's Pro Se Electronic Filing Portal in Case No. 1:26-cv-01077. The
8 CM/ECF system will serve all counsel of record upon their appearance.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

INDEX OF AUTHENTICATED EXHIBITS

Ex.	Document	What It Establishes
A	Lake County online portal printout (June 19, 2026) <i>[Pages 9–13]</i>	The manipulated state court docket showing the resurrected and backdated "June 15" entry representing the 82-page Omnibus Filing and Faretta Invocation.
B	Order Lifting Stay of 180-Day Jail Term (June 17, 2026) <i>[Pages 14–15]</i>	The ex parte order signed by Judge Stride on June 17, 2026, but concealed from the public docket until June 18, 2026, at 10:48 a.m., lifting the stay on Petitioner's jail term without a hearing.
C	USPS Certified Mail Labels & Tracking (June 19, 2026) <i>[Pages 16–20]</i>	USPS printout and certified labels confirming that the physical package remains undelivered and stalled in transit.
D	Written ESI Preservation Demand & Litigation Hold Email (June 17, 2026) <i>[Pages 21–23]</i>	Verbatim email notification and formal ESI preservation demand served on state court and prosecution officials immediately following the June 17 remote lockout, establishing actual notice of pending federal litigation and duty to preserve.
E	Omnibus Verified Motion for Substitution of Judge Fax Cover (June 18, 2026) <i>[Pages 24–27]</i>	The formal invocation of the statutory transfer mandate under 725 ILCS 5/114-5(d), served via facsimile on the Chief Judge, State's Attorney, Clerk, and Public Defender.
F	Fax Transmission Confirmation Receipts and Screenshots (June 18, 2026) <i>[Pages 28–31]</i>	The official mobile fax confirmation receipts proving successful delivery of the 39-page substitution package to the Chief Judge (5:07 AM), State's Attorney (5:09 AM), and Public Defender (5:10 AM) on the morning of June 18, 2026.

EXHIBIT A

LAKE COUNTY ONLINE PORTAL CASE ACTION PAGE (PRINTED JUNE 19, 2026)

SUPPLEMENTAL HABEAS EVIDENTIARY RECORD — ALLABABIDI v. JUNKIN — CASE NO. 1:26-cv-01077

Resurrected and backdated Correspondence entry falsely dated June 15, 2026.

WHAT THIS EXHIBIT ESTABLISHES:

The manipulated state court docket sheet. The Clerk resurrected a rejected digital file to fabricate a filing date of June 15, 2026, to cover up the lockout on June 17, 2026.

- Shows the 82-page Omnibus Motion and Faretta Invocation as filed on June 15
- Proves the court possessed the self-representation demand 48 hours prior to the hearing
- Shows post-filing bad-faith docket manipulation by state actors

BINDING LEGAL PRECEDENTS & STATUTORY AUTHORITY:

§ *Antoine v. Byers & Anderson, Inc.*, 508 U.S. 429, 435–37 (1993) (Docketing and record-keeping are purely ministerial duties, not judicial functions, and do not receive quasi-judicial immunity).

§ *Snyder v. Nolen*, 380 F.3d 279, 284–89 (7th Cir. 2004) (The Clerk's ministerial duties of docketing filings are mandatory; deliberate failure to docket or ledger alterations violate the right of access to courts).

§ *Loubser v. Thacker*, 440 F.3d 439, 442 (7th Cir. 2006) (Clerks of court are not entitled to absolute quasi-judicial immunity when they manipulate the docketing process or refuse to file documents).

§ *Forrester v. White*, 484 U.S. 219, 229 (1988) (Absolute judicial immunity does not protect judges when acting in an administrative, executive, or record-keeping capacity, including ledger or database manipulations).

§ 18 U.S.C. § 1519 (Federal felony for manual falsification or retroactive alteration of any record in relation to or in anticipation of a federal civil rights investigation).

§ Fed. R. Civ. P. 37(e)(2) (Mandates an adverse inference presumption of bad faith when electronically stored information (ESI) is intentionally altered or destroyed).



Circuit Court of the Nineteenth Judicial Circuit

Lake County, Illinois

23CF00001146 Warrant/Attach.After Sentence/Jdgmt

PEOPLE VS ALLABABIDI

Criminal/Traffic: Criminal Felony - Filed: 06/14/2023

[Parties](#)

[Charges/Dispositions/Sentences](#)

[Court Events](#)

[Documents Filed](#)

[Financial](#)

Documents-Invite

[Add Proposed Order](#)

Documents

Filed Date	Document Type	Document Action
06/18/2026	Order	Filed View
06/18/2026	Minute Record	View
06/17/2026	Order	Filed View
06/15/2026	Correspondence	View
05/28/2026	Warrant WT	Filed eMail View
05/28/2026	Minute Record	View
05/14/2026	Petition to Revoke	Filed View
05/14/2026	Notice Of Motion	Filed View
04/08/2026	Memorandum Probation Violation	Filed View
03/10/2026	Minute Record	View
01/26/2026	Minute Record	View
12/11/2025	Minute Record	View
12/08/2025	Petition RELIEF	View
12/08/2025	Motion combined motion	View
11/25/2025	Petition RELIEF	View
11/25/2025	Mail EXHIBIT PACKET	View

Filed Date	Document Type	Document Action
11/17/2025	Order (appeal is dismissed)	Filed View
11/12/2025	Notice	View
11/12/2025	Motion	View
11/10/2025	Notification of Changes to the Probation Fee Schedule	View
10/31/2025	Order (due 12/8/25)	Filed View
10/06/2025	Minute Record	View
10/06/2025	Notice of Appeal - Criminal/Juvenile	Filed Issued View
10/02/2025	Notice Of Motion	View
10/02/2025	Motion To Stay DL Revocation	View
10/02/2025	Affidavit	View
09/09/2025	Report of Felony Conviction	View
09/08/2025	Order	Filed View
09/08/2025	Order	Filed View
09/08/2025	Order	Filed View
09/08/2025	Order	Filed View
09/08/2025	Order- Nolle Prossed	Filed View
09/08/2025	Minute Record	eMail eMail View
09/08/2025	Adult Probation Court Referral Slip	eMail View
09/08/2025	Adult Probation Court Referral Slip	eMail View
08/26/2025	Minute Record	eMail eMail View
08/12/2025	Minute Record	eMail eMail View
08/07/2025	Pretrial PTBS Status Report	Filed View
07/23/2025	Minute Record	eMail eMail View
06/27/2025	Minute Record	eMail eMail View
06/23/2025	Order	
06/23/2025	Order	View
06/12/2025	Minute Record	eMail eMail View
04/30/2025	Minute Record	eMail eMail View
.....	Order	Filed View

Filed Date	Document Type	Document Action
03/25/2025	Answer	Filed View
03/19/2025	Minute Record	eMail eMail View
02/18/2025	Minute Record	eMail eMail View
02/18/2025	Minute Record	eMail eMail View
01/03/2025	Minute Record	eMail eMail View
11/26/2024	Minute Record	eMail eMail View
11/26/2024	Minute Record	eMail eMail View
11/21/2024	Memorandum	Filed View
10/29/2024	Minute Record	eMail eMail View
10/11/2024	Minute Record	eMail eMail View
09/24/2024	Minute Record	eMail eMail View
09/20/2024	Petition	Filed View
09/20/2024	Petition	Filed View
09/19/2024	Memorandum	Filed View
08/22/2024	Minute Record	eMail eMail View
08/12/2024	Disclosure To the Accused	Filed View
07/24/2024	Minute Record	eMail eMail View
06/25/2024	Minute Record	eMail eMail View
06/24/2024	Pretrial PTBS Status Report	Filed View
06/20/2024	Order	Filed View
06/12/2024	Disclosure To the Accused	Filed View
06/12/2024	Motion	Filed View
05/14/2024	Minute Record	eMail eMail View
05/02/2024	Minute Record	eMail eMail View
03/30/2024	Conditions of Pretrial Release Order	Filed View
03/30/2024	First Appearance Order 171-539	Filed View
03/30/2024	Warrant (Returned)	View
03/30/2024	Release	View
03/30/2024	Minute Record	eMail eMail View

Filed Date	Document Type	Document Action
06/14/2023	Indictment	Filed View
06/14/2023	Certificate	Filed View
06/14/2023	Warrant WT	Issued Served Returned
06/14/2023	Case Document Images MINUTE SHEET -	View
xxxxx ACCESS DENIED xxxxx	xxxxx ACCESS DENIED xxxxx	

Copyright © Journal Technologies, USA. All rights reserved.

EXHIBIT B

ORDER LIFTING STAY OF 180-DAY JAIL TERM

SUPPLEMENTAL HABEAS EVIDENTIARY RECORD — ALLABABIDI v. JUNKIN — CASE NO. 1:26-cv-01077

Ex parte order signed by Judge Stride on June 17, 2026, but concealed until June 18, 2026.

WHAT THIS EXHIBIT ESTABLISHES:

The ex parte order signed by Judge Stride during the active remote hearing lockout, unilaterally activating Petitioner's 180-day jail term without a hearing, notice, or counsel present.

- Signed June 17, 2026, but file-stamped June 18, 2026, at 10:48 a.m.
- Unilaterally deprives Petitioner of liberty in violation of *Gagnon v. Scarpelli* and 730 ILCS 5/5-6-4
- Confirms the ex parte deprivation occurred while Petitioner was actively locked out of court

BINDING LEGAL PRECEDENTS & STATUTORY AUTHORITY:

§ *Gagnon v. Scarpelli*, 411 U.S. 778, 781–86 (1973) (Probationers are constitutionally guaranteed notice, counsel, and a preliminary probable cause hearing before stayed sentences can be lifted and liberty deprived).

§ 730 ILCS 5/5-6-4 (Mandates a formal court hearing, evidentiary presentation, and judicial determination of probation violations prior to probation revocation or execution of stayed jail terms).

§ *In re Oliver*, 333 U.S. 257, 273 (1948) (Secret proceedings and Star Chamber trials are constitutionally prohibited; the accused has a right to an open, public hearing).

§ *Manuel v. City of Joliet*, 580 U.S. 357, 364–67 (2017) (The Fourth Amendment governs restraints on liberty post-process; the execution of a concealed or un-docketed custodial instrument represents an unconstitutional seizure).

§ *Mireles v. Waco*, 502 U.S. 9, 11–12 (1991) and *Stump v. Sparkman*, 435 U.S. 349, 356–57 (1978) (Absolute judicial immunity is forfeited when a judge acts in the clear absence of all jurisdiction).

§ 42 U.S.C. § 1983 (Judicial immunity does not bar prospective injunctive relief where, as here, the ex parte, off-the-record nature of the custodial execution rendered declaratory relief inherently unavailable prior to the deprivation).

§ *Faretta v. California*, 422 U.S. 806, 819–21 (1975) (Substantive rulings made without conducting a self-representation colloquy after clear invocation are void ab initio for lack of jurisdiction).

IN THE CIRCUIT COURT OF THE NINETEENTH
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

Erin Cartwright Weinstein
Clerk of the Court
Lake County, Illinois

PEOPLE OF THE STATE OF ILLINOIS

vs.

EHAB ALLABABIDI

GEN. NO. 23CF00001146

ORDER

This matter coming before this Honorable Court with the Court being fully advised of the premises. It is so ordered:

1. The stay of the 180 day Lake County Jail term of the defendant's sentence is hereby lifted.

Enter:

Dated: June 17, 2026



JUDGE

EXHIBIT C

USPS WEBSITE PRINTOUT AND CERTIFIED MAIL LABELS (JUNE 19, 2026)

SUPPLEMENTAL HABEAS EVIDENTIARY RECORD — ALLABABIDI v. JUNKIN — CASE NO. 1:26-cv-01077

USPS printout and certified labels showing delivery failure (still not delivered as of June 19, 2026).

WHAT THIS EXHIBIT ESTABLISHES:

The official USPS tracking page printed on June 19, 2026, and the certified mail labels, confirming that the physical package remains undelivered and stalled in transit.

- USPS official printout confirms mail remains undelivered as of June 19, 2026
 - Includes copy of original certified mail labels
 - Further disproves the physical possibility of a June 15 filing
-

BINDING LEGAL PRECEDENTS & STATUTORY AUTHORITY:

§ *Denius v. Dunlap*, 330 F.3d 919, 926 (7th Cir. 2003) (Forensic proof of delivery status from government websites constitutes judicial notice evidence disproving physical delivery).

§ Fed. R. Evid. 902(13) (Data copied from electronic devices, when accompanied by a process of digital identification, is self-authenticating).

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THR...

USPS Tracking®

[FAQs >](#)

Tracking Number:

[Remove X](#)

9402611898765528934061

[Copy](#)

[Add to Informed Delivery](#)

Latest Update

Your item arrived at our USPS facility in PALATINE IL DISTRIBUTION CENTER on June 9, 2026 at 7:55 am. The item is currently in transit to the destination.

Get More Out of USPS Tracking:

[USPS Tracking Plus®](#)

On the Way

Arrived at USPS Facility

PALATINE IL DISTRIBUTION CENTER
June 9, 2026 7:55 AM

Arrived at USPS Facility

CAROL STREAM IL DISTRIBUTION CENTER
June 9, 2026 12:08 AM

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean?](#)

Text & Email Updates



USPS Tracking Plus®





Certified Mail Tracking Summary Report Detail

[HOME](#) / [REPORTS](#) / [SUMMARY TRACKING REPORT](#) / [DETAIL](#)

[← Back](#)

[✓ Update & Create Report](#)



Ehab Allababidi
8516 W WINONA ST
CHICAGO IL 60656-2720

US POSTAGE AND FEES PAID
PRIORITY MAIL IMI
Jun 08 2026
Mailed from ZIP 60656
1 LB PRIORITY MAIL RATE
ZONE 1
11923275
Commercial



endicia.

063S0011485629

USPS CERTIFIED MAIL



9402 6118 9876 5528 9340 61

Office of the Clerk of the Circuit Court
Clerk of the Court Erin Cartwright Weinstein
18 N COUNTY ST
WAUKEGAN IL 60085-4369



Feedback & Support

Reference	
USPS #	9402611898765528934061
USPS Mail Class	Certified with Electronic Delivery Confirmation



USPS History	<p>Arrived at USPS Facility, PALATINE IL DISTRIBUTION CENTER, June 9, 2026, 7:55 am</p> <p>Arrived at USPS Facility, CAROL STREAM IL DISTRIBUTION CENTER, June 9, 2026, 12:08 am</p> <p>Departed Post Office, HARWOOD HEIGHTS, IL 60706, June 8, 2026, 7:32 pm</p> <p>USPS in possession of item, HARWOOD HEIGHTS, IL 60706, June 8, 2026, 10:00 am</p> <p>Shipping Label Created, CHICAGO, IL 60656, June 7, 2026, 6:17 pm</p>
Updated Date	06/17/2026 12:04:16
Transaction ID	29815880
Transaction Date	06/07/2026 23:17:35
User #	196903
Account #	196903
Electronic Delivery Confirmation	
Return Receipt (Signature)	
Delivery Information	
To Name	Clerk of the Court Erin Cartwright Weinstein
To Company	Office of the Clerk of the Circuit Court
To Address1	18 N. County St
To Address2	


Feedback & Support




To Zip	60656
--------	-------

Get in Touch

CONTACT US

 **Address:** 950 Celebration Blvd Suite A
Celebration, FL 34747
USA

 **Phone:** 800-406-1792

FOLLOW US



QUICK LINKS

- [About Us](#)
- [Schedule a Demo](#)

RESOURCES

- [API & SFTP Automation](#)
- [Excel Batch Labels](#)
- [Frequently Asked Questions](#)
- [Order Envelopes](#)
- [Single Label Creation](#)

REPORTS

- [Certified Mail Tracking Scan](#)
- [Certified Mail Tracking Summary Report](#)
- [Electronic Delivery Confirmation Report](#)
- [Electronic Signature Report](#)

Feedback & Support

EXHIBIT D

WRITTEN ESI PRESERVATION DEMAND & LITIGATION HOLD EMAIL (JUNE 17, 2026)

SUPPLEMENTAL HABEAS EVIDENTIARY RECORD — ALLABABIDI v. JUNKIN — CASE NO. 1:26-cv-01077

Formal litigation hold and electronic record preservation demand served immediately after the June 17 lockout.

WHAT THIS EXHIBIT ESTABLISHES:

The electronic mail communication sent on June 17, 2026, at 10:44 p.m. CST, formally serving an urgent litigation hold and ESI preservation demand on the Lake County Circuit Clerk, shorthand reporters, State's Attorney, and Judge Stride, establishing immediate duty to preserve all records.

- Demands continuous unparsed audio/video recording (ECR) for the June 17 morning session
 - Demands Zoom participant logs and telemetry metadata for the remote lockout session
 - Demands the suspension of automated backup deletion protocols
 - Establishes actual notice of pending federal civil rights litigation and JIB complaint prior to the June 19 spoliation
-

BINDING LEGAL PRECEDENTS & STATUTORY AUTHORITY:

§ *Fed. R. Civ. P. 37(e)* (Triggers mandatory spoliation sanctions and adverse inference findings upon the intentional destruction or alteration of electronic records subject to a preservation duty).

§ 18 U.S.C. § 1512(c) (Federal crime to corruptly alter, destroy, or conceal a record, document, or other object to impair its integrity or availability for use in an official proceeding).

§ 18 U.S.C. § 1519 (Federal felony for the modification, falsification, or destruction of any record in anticipation of or relation to a federal investigation).



Ehab Hilfiger <defcon5ready@gmail.com>

**URGENT ESI PRESERVATION & RECORD DEMAND: Unparsed ECR & Transcript
(Case No. 23 CF 1146 / June 17, 2026)**

1 message

Ehab Hilfiger <defcon5ready@gmail.com>

Wed, Jun 17, 2026 at 10:44 PM

To: courts@lakecountyil.gov, cpruitt@lakecountyil.gov, Circuit Clerk <CircuitClerk@lakecountyil.gov>, hbecerra@lakecountyil.gov

Cc: cstride@lakecountyil.gov, dshanes@lakecountyil.gov, nshepherd@lakecountyil.gov, Lake County State's Attorney <statesattorney@lakecountyil.gov>

Bcc: pin@usdoj.gov, usails.civilrights@usdoj.gov

To the Official Certified Shorthand Reporters, Electronic Court Reporter (T-611), and the Clerk of the Circuit Court:

Pursuant to the written directive issued by the Circuit Clerk's Office on January 28, 2026, instructing that verbatim transcript requests for Courtroom T-611 must be directed to the Official Certified Shorthand Reporters and Computer-Aided Transcripts, I am submitting this formal demand for the immediate production of the record in *People v. Allababidi*, Case No. 23 CF 1146.

I am requesting the complete verbatim transcript and the continuous, unaltered Electronic Court Recording (ECR) for the entirety of the morning session held on Wednesday, June 17, 2026, before the Honorable Christopher R. Stride in Courtroom T-611.

Because this proceeding resulted in a zero-bond warrant, the refusal of a hearing, and is currently the subject of active federal civil rights litigation (N.D. Ill. Case Nos. 1:26-cv-01077 and 1:26-cv-06738) alongside an active Illinois Judicial Inquiry Board complaint, the production must include:

1. The Continuous Unparsed ECR (Audio/Video Feed): A raw, continuous digital export (MP4/WAV) of the complete courtroom T-611 Zoom feed from 9:00 a.m. to 11:00 a.m. CST. The scope of this demand explicitly covers the continuous live audio and video feed of the courtroom during the roughly two-hour window I was held in the virtual waiting room. This continuous block is required to verify the chronological integrity of the docket queue, the presence of State personnel, and the continuity of the record prior to my admission.

2. The Verbatim Transcript: The complete certified transcription of the proceeding, explicitly encompassing the exact moment I was admitted from the virtual waiting room, the entirety of my interaction with Judge Stride, his declaration that my appearance was a "nullity," and his unilateral termination of the hearing.

3. The Zoom Telemetry & Waiting Room Audit Logs: The electronic usage reports, participant logs, and administrative metadata generated by the Courtroom T-611 Zoom platform (Meeting ID 835 2271 3472). This must include the exact timestamp of my connection at 9:17 a.m. and the documented duration I was held in the virtual waiting room while the host was active.

This transmission constitutes a mandatory, continuing ESI Preservation Demand under state and federal law for all electronic records, metadata, and continuous AV captures associated with this specific date and session. No portion of the 9:00 a.m. to 11:00 a.m. block may be deleted, overwritten, or selectively parsed.

Please advise immediately regarding the required fee waiver forms for an indigent defendant proceeding *pro se*. My indigency is already a matter of record via federal *in forma pauperis* determinations. Please confirm receipt of this demand and provide the timeline for the electronic delivery of the unparsed ECR and transcript to this email address.

Govern yourselves accordingly.

Respectfully,

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



Ehab Allababidi

Personal Signature

Phone: 773-920-0030 (CAGE 16QC7)

Email: defcon5ready@gmail.com

LEGAL NOTICE & CONFIDENTIALITY

This email (and any attachments) is intended solely for the named recipient and may contain confidential, privileged, or proprietary information. Disclosure, distribution, copying, or use without the sender's prior written consent is prohibited. If you received this in error, delete it and notify the sender immediately.

1. Unauthorized use may violate privacy, contract, and intellectual-property laws.
2. No rights, privileges, or defenses are waived by this transmission.
3. Instructions and directives herein constitute written notice for compliance and recordkeeping.
4. This communication is restricted to the designated recipient and is not to be forwarded or archived without authorization.

EXHIBIT E

OMNIBUS VERIFIED MOTION FOR SUBSTITUTION OF JUDGE FOR CAUSE (EXCERPTS)

SUPPLEMENTAL HABEAS EVIDENTIARY RECORD — ALLABABIDI v. JUNKIN — CASE NO. 1:26-cv-01077

Fax cover sheet and first two pages of the emergency substitution motion package served June 18, 2026.

WHAT THIS EXHIBIT ESTABLISHES:

Petitioner's formal invocation of the statutory transfer mandate under 725 ILCS 5/114-5(d), served via facsimile on the Chief Judge, the State's Attorney, the Clerk, and the Public Defender (Excerpts showing the transmittal cover page and the first two pages of the verified motion).

- Transmitted on the morning of June 18, 2026, prior to the docketing of the stay lift order
 - Formally notifies Chief Judge Shanes and Judge Stride of the mandatory jurisdictional transfer bar
 - Excerpts include the formal transmittal cover page and the jurisdictional statement of the motion
-

BINDING LEGAL PRECEDENTS & STATUTORY AUTHORITY:

§ 725 ILCS 5/114-5(d) (Upon the filing of a motion for substitution for cause, the judge shall have no power to enter substantive rulings).

§ *People v. Brim*, 241 Ill. App. 3d 245, 249 (4th Dist. 1993) (Substantive rulings entered by a judge after a motion for substitution for cause is filed are void).

§ *People v. Bell*, 276 Ill. App. 3d 939, 946–47 (1st Dist. 1995) (Once a motion for substitution of judge for cause is presented, the judge cannot proceed with hearings or substantive orders until the motion is resolved).

SUPPLEMENTAL FAX TRANSMITTAL

OMNIBUS VERIFIED MOTION FOR SUBSTITUTION OF JUDGE FOR CAUSE AND FOR APPOINTMENT OF SPECIAL PROSECUTOR

URGENT — Active Zero-Bond Warrant — Case No. 23 CF 1146 — 19th Judicial Circuit, Lake County, Illinois

EMERGENCY FILING — STATUTORY TRANSFER MANDATE (725 ILCS 5/114-5(d))

People v. Allababidi, No. 23 CF 1146 — Hon. Christopher R. Stride, Judge Presiding, Courtroom T-611

*** IMMEDIATE TRANSFER REQUIRED * NAMED JUDGE STATUTORILY BARRED FROM SUBSTANTIVE RULINGS ***

TO:	Chief Judge Daniel B. Shanes — (847) 984-5626 / dshanes@lakecountyil.gov Circuit Judge Christopher R. Stride — (847) 360-6409 / cstride@lakecountyil.gov Lake County Circuit Clerk Erin Cartwright Weinstein — (847) 360-6409 / CircuitClerk@lakecountyil.gov Lake County State’s Attorney Eric Rinehart — (847) 360-0993 / statesattorney@lakecountyil.gov
CC:	ASA Nicholas Shepherd — nshepherd@lakecountyil.gov Public Defender (Ticsay / Russell) — (847) 984-5751 / GTicsay@lakecountyil.gov; BRussell@lakecountyil.gov Court Administrator Cynthia Pruitt — cpruitt@lakecountyil.gov
FROM:	Ehab Allababidi, Defendant-Petitioner, Pro Se 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com
RE:	SUPPLEMENTAL FAX TRANSMITTAL: Omnibus Verified Motion for Substitution of Judge for Cause (725 ILCS 5/114-5(d)) and for Appointment of Special Prosecutor (55 ILCS 5/3-9008) — Emergency Filing — People v. Allababidi, No. 23 CF 1146
DATE:	June 18, 2026
ENCLOSED:	Omnibus Verified Motion for Substitution of Judge for Cause (725 ILCS 5/114-5(d)) and for Appointment of Special Prosecutor (55 ILCS 5/3-9008) Supporting Affidavit (735 ILCS 5/1-109) Exhibits 1–4: Zoom Screenshots, PD Email, Court Half-Sheet, Nunc Pro Tunc Order [Proposed] Order of Transfer Pursuant to 725 ILCS 5/114-5(d) Exhibit 5: Lake County Portal Filing Receipt (JTI Ref. dc5ffbe9a07e) Exhibit 6: [Proposed] Order of Transfer (725 ILCS 5/114-5(d))

WHY THIS FILING IS URGENT:

On June 17, 2026, Judge Stride conducted a remote hearing in which he locked Defendant in a Zoom waiting room for approximately two hours, refused to permit him to speak, declared his appearance “a nullity”, and left the zero-bond warrant active. At 2:50 PM that same afternoon — hours after receiving Defendant’s 10:25 AM waiting-room objection email — Judge Stride entered a nunc pro tunc order discharging the Public Defender retroactively to October 6, 2025. On June 16, 2026, Judge Stride conducted a scheduling proceeding regarding Defendant’s case and representation status entirely in his absence, without notice, and without an appearance link. ASA Nicholas Shepherd is a named defendant in a pending federal civil rights action against the same individual he is prosecuting (No. 1:26-cv-06738). A judge who is an active target of a JIB prosecution and a prosecutor who is a named federal civil defendant cannot lawfully adjudicate or prosecute the liberty of the litigant who initiated those proceedings. This filing invokes the mandatory statutory transfer of jurisdiction under 725 ILCS 5/114-5(d). The Chief Judge must immediately reassign this case.

DOCUMENTS TRANSMITTED WITH THIS COVER SHEET:

Omnibus Verified Motion for Substitution of Judge for Cause (725 ILCS 5/114-5(d)) and for Appointment of Special Prosecutor (55 ILCS 5/3-9008)

SUPPLEMENTAL FAX TRANSMITTAL

Omnibus Verified Motion for Substitution of Judge for Cause (725 ILCS 5/114-5(d)) and for Appointment of Special Prosecutor (55 ILCS 5/3-9008)

People v. Allababidi, No. 23 CF 1146 — 19th Judicial Circuit, Lake County

I. WHAT THIS TRANSMITTAL IS

This is not a routine filing notice. It is a formal demand that the statutory transfer mechanism under 725 ILCS 5/114-5(d) be executed immediately. The attached motion, supporting affidavit, and four exhibits document that Judge Christopher R. Stride has abandoned all pretense of impartiality and that ASA Nicholas Shepherd is structurally conflicted from prosecuting this matter. The motion is accompanied by a sworn affidavit establishing the factual predicate for substitution for cause.

II. WHY THIS FILING IS URGENT

On June 17, 2026, Judge Stride conducted a remote hearing in which he **locked Defendant in a Zoom waiting room for approximately two hours**, refused to permit him to speak, accused him of “harassing” court staff for stating a single sentence, declared his appearance “a nullity”, and terminated the session without recalling the outstanding zero-bond warrant. At 2:50 p.m. that same afternoon — hours after receiving Defendant’s 10:25 a.m. waiting-room objection email — Judge Stride entered a nunc pro tunc order discharging the Public Defender retroactively to October 6, 2025. On June 16, 2026, Judge Stride conducted a scheduling proceeding regarding Defendant’s case entirely in his absence, without notice, and without an appearance link, constituting an ex parte communication prohibited by Illinois Code of Judicial Conduct Rule 2.9. The May 28, 2026 warrant was issued without the mandatory preliminary hearing, without an ability-to-pay inquiry, and with no defense counsel present. These facts establish a total collapse of the adversarial process.

III. THE STATUTORY MANDATE

Under 725 ILCS 5/114-5(d), upon the filing of a motion for substitution of judge for cause supported by affidavit, **the named judge loses all power to enter substantive rulings** and the matter must be immediately transferred to another judge for an evidentiary hearing. Judge Stride is statutorily barred from any further action in this case. The Chief Judge must immediately reassign this cause and schedule a hearing on the merits of the substitution motion.

IV. THE STRUCTURAL CONFLICT

ASA Nicholas Shepherd is a named, individual-capacity defendant in *Allababidi v. Shepherd, et al.*, No. 1:26-cv-06738 (N.D. Ill.), a pending 42 U.S.C. § 1983 civil rights action. Shepherd personally swore the May 14, 2026 Petition for Revocation containing false allegations that he knew were refuted by the State's own records. He refused to disqualify himself at the June 17 hearing despite being the complaining witness under *Kalina v. Fletcher*, 522 U.S. 118 (1997). A prosecutor cannot wield the police power of the State to incarcerate his own civil adversary. The entire Lake County State's Attorney's Office is structurally conflicted.

V. DEMANDS

Immediate Transfer. The Clerk shall immediately transfer the cause file to Chief Judge Daniel B. Shanes for assignment and an evidentiary hearing on the substitution of Judge Stride for cause, as mandated by 725 ILCS 5/114-5(d).

Stay of the Warrant. Execution of the May 28, 2026 zero-bond bench warrant shall be stayed pending the Chief Judge's resolution of the cause hearing. The Sheriff's Warrants Division shall be notified immediately.

Disqualification and Special Prosecutor. The Lake County State's Attorney's Office shall be disqualified, and an independent Special Prosecutor shall be appointed pursuant to 55 ILCS 5/3-9008(a-10), drawn from an outside jurisdiction.

Record Preservation. All records related to Case No. 23 CF 1146 shall be preserved, including the complete June 17, 2026 audio recording, Zoom telemetry logs, portal audit trails, and the nunc pro tunc discharge order entered at 2:50 p.m. on June 17, 2026.

Respectfully,

/s/ Ehab Allababidi

EHAB ALLABABIDI, Defendant-Petitioner, Pro Se

8516 W. Winona St., Chicago, IL 60656

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

Dated: June 18, 2026

DECLARATION (28 U.S.C. § 1746): I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that each factual assertion is corroborated by the documents transmitted herewith.

ENCLOSURES:

EXHIBIT F

FAX TRANSMISSION CONFIRMATION RECEIPTS AND SCREENSHOTS (JUNE 18, 2026)

SUPPLEMENTAL HABEAS EVIDENTIARY RECORD — ALLABABIDI v. JUNKIN — CASE NO. 1:26-cv-01077

Mobile fax receipts proving successful delivery of the 39-page substitution package.

WHAT THIS EXHIBIT ESTABLISHES:

The official transmission receipts confirming completed delivery to Chief Judge Shanes, the State's Attorney, and the Public Defender on the morning of June 18, 2026, hours before the stay lift order was entered.

- Chief Judge Shanes (+1 847 984-5626): Delivered at 5:07 AM CDT on June 18, 2026
 - State's Attorney (+1 847 360-0993): Delivered at 5:09 AM CDT on June 18, 2026
 - Public Defender (+1 847 984-5751): Delivered at 5:10 AM CDT on June 18, 2026
 - Establishes actual service and receipt hours before the 10:48 AM file-stamp on the stay lift order
-

BINDING LEGAL PRECEDENTS & STATUTORY AUTHORITY:

§ *Denius v. Dunlap*, 330 F.3d 919, 926 (7th Cir. 2003) (Factual proof of electronic transmission status from government or system reports constitutes judicial notice evidence).

§ Fed. R. Evid. 902(13) (Electronic records or metadata are self-authenticating when accompanied by a process of digital identification).



Mobile fax



Fax Delivered!

To: Chief judge Daniel b shanes
+1 (847) 984-5626

Started: 4:20 AM CDT, 06/18/2026
Finished: 5:07 AM CDT, 06/18/2026

Files:



2026-06-18_042044.pdf
f
39 pages
7.87 MB

Print Confirmation

Exit Fax





Mobile fax



Fax Delivered!

To: States attorney lake county
+1 (847) 360-0993

Started: 4:22 AM CDT, 06/18/2026
Finished: 5:09 AM CDT, 06/18/2026

Files:



2026-06-18_042214.pdf
f
39 pages
7.87 MB

Print Confirmation

Exit Fax





Mobile fax

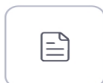


Fax Delivered!

To: Lake county public defender
office
+1 (847) 984-5751

Started: 4:23 AM CDT, 06/18/2026
Finished: 5:10 AM CDT, 06/18/2026

Files:



2026-06-18_042321.pd
f
39 pages
7.87 MB

Print Confirmation

Exit Fax

