

LAKE COUNTY PUBLIC DEFENDER'S OFFICE

URGENT ATTORNEY-CLIENT & DOCKET TRANSMISSION

DELIVERED BY EMAIL & FACSIMILE — CASE NO. 23 CF 1146 — ACTIVE ZERO-BOND WARRANT

NOTICE OF EX PARTE COMMUNICATION, DEFAULT, AND DEMAND FOR REMOTE APPEARANCE

FINAL NOTICE AND DEMAND — PUBLIC DEFENDER'S OFFICE

The Office has disclaimed representing Petitioner; it must now make that official and withdraw of record under Rule 13(c).

TO:	Gregory C. Ticsay, Chief Public Defender (GTicsay@lakecountyil.gov) Bailey C. Russell, Assistant Public Defender (BRussell@lakecountyil.gov) Lake County Public Defender's Office, 15 S. County St., Waukegan, IL 60085
CC:	Nicholas Shepherd, Assistant State's Attorney (nshepherd@lakecountyil.gov); Illinois ARDC (information@iadc.org); Clerk of the Circuit Court, Erin Cartwright-Weinstein, and Hanna Becerra, Criminal/Traffic Court Services; Lake County Human Resources (Fax 847-984-5988); 19th Judicial Circuit Administrator / Judicial HR (Fax 847-984-5626); Risk Management & Civil Liability (Fax 847-984-5859); filed of record, Nos. 1:26-cv-06738 and 1:26-cv-01077 (N.D. Ill.)
FROM:	Ehab Allababidi, Defendant, Pro Se 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com
RE:	The contradiction between the Office's written disclaimer of representation and its continuing "PD APPOINTED" status on the docket, which the Clerk uses to refuse Petitioner's pro se filings; the Office's June 16, 2026 ex parte communication with the presiding judge in Petitioner's absence; the off-thread fragmentation of the record; and Petitioner's demand that the Office immediately WITHDRAW of record under Supreme Court Rule 13(c). Petitioner is himself noticing and filing the Emergency Motion to Stay, served herewith as Exhibit D.
DATE:	June 16, 2026
PAGES:	Pages: 20 (incl. this cover)

Why this notice, and why now:

On June 16, 2026, by the Office's own written account, an attorney from this Office stood before the presiding judge and addressed Petitioner's representation status while Petitioner — who has a zero-bond warrant outstanding for his arrest — was neither present nor noticed, and a hearing was set for next week in his absence. That same day the Office defaulted on a written June 16, 2026, 5:00 PM CDT deadline to perform a single ministerial act that would have cured the docket lockout its own counsel-of-record status created. And the Office's reply was routed onto a separate email thread of its own making, away from the operative demand — though the consolidated record preserves the full timeline regardless. Petitioner is no longer waiting on the Office: he is himself noticing and filing his own emergency motion. The single act that remains, and that only the Office can perform, is to withdraw of record. This notice demands it.

FINAL NOTICE AND DEMAND TO THE PUBLIC DEFENDER'S OFFICE

Ill. R.P.C. 1.16(d); Ill. S. Ct. R. 13(c); U.S. Const. Amends. VI & XIV — Case No. 23 CF 1146

To the Chief Public Defender and to the Assistant Public Defender: This notice is written because the Office has, in a single day, taken three positions that cannot coexist while a zero-bond warrant runs against an indigent man. It told the client he is not represented. It told the judge the same thing — in the client's absence, without notice, without his participation. And it left its name on the docket as the very counsel of record that bars him from filing for himself. Those three positions — “we do not represent you”, “this was confirmed today in court”, and “PD APPOINTED” on a live custodial warrant — cannot occupy the same record at the same time. Petitioner has stopped waiting for the Office to reconcile them. He is now noticing and filing his own emergency motion to stay the warrant — a motion the Office was asked to file seventeen days ago and did not. The single act that remains, that only the Office can perform, and that this notice demands, is to make its own words official: withdraw of record, clear the docket, and let the record reflect what every participant already knows.

I. THE CLOSED LOOP — REPRESENTATION ASSERTED AND DISCLAIMED AT ONCE

By the Office's own written account, it has not represented Petitioner since October 6, 2025 (Ex. A). Yet the zero-bond warrant issued May 28, 2026 recites “PD APPOINTED” on its face (Ex. C). The Circuit Clerk has refused Petitioner's pro se filings *precisely because* the Office remains counsel of record. The contradiction is documentary on both sides: the Office says it does not represent him, and the authority of the tribunal says it does. A person caught between those two assertions cannot file a motion to resolve the contradiction, because every filing he tenders is refused on the basis of the very record he is trying to correct. **There is one clean exit, and only the Office can take it:** withdraw of record under Supreme Court Rule 13(c) so the docket reflects the pro se status the Office has already conceded in three separate communications. Petitioner does not ask the Office to resume a representation it abandoned and that conflict now forbids; he asks only that it stop occupying his docket as phantom counsel. *Its unwithdrawn name is the bar; its withdrawal is the cure.*

II. THE JUNE 16, 2026 EX PARTE COMMUNICATION

Russell's email of June 16, 2026, 3:52 PM CT [7:52 PM ET header; VPN timezone] (Ex. A) states two things, and together they establish a constitutional violation in the Office's own words. She writes: “This was confirmed today in court by the Judge.” And she writes: “The Court is motioning up your case for next week in order for you to appear.” By the Office's own account, an attorney appeared before the presiding judge, addressed the defendant's representation status, and a hearing was set — while the defendant was neither present nor noticed and had no appearance link or opportunity to be heard. A proceeding that touches an accused's liberty, conducted in his absence and without notice, offends the most elementary requirement of due process: notice and an opportunity to be heard. *Morrissey v. Brewer*,

408 U.S. 471 (1972). The Sixth Amendment guarantees the accused the right to be present at every critical stage of the proceeding. *Rushen v. Spain*, 464 U.S. 114 (1983); *Kentucky v. Stincer*, 482 U.S. 730 (1987). The scheduling of a hearing before a judge who holds a zero-bond warrant against a defendant is a critical stage. The Office cannot simultaneously tell the client it does not represent him and speak about his case to the judge *as though it does*. It cannot assert, in the same paragraph, that it has no duty to represent him and that it has obtained a scheduling directive in his absence. These two statements cannot both be true. One of them is the representation the Office disclaims; the other is the representation it performed.

III. THE FRAGMENTATION OF THE RECORD — AND THE LITIGATION HOLD THAT DEFEATS IT

Petitioner's operative communication — the Rule 13(c) and Rule 1.16(d) Demand (Ex. B) — was a single, dated, demanding thread. A response was due on that thread. The Office did not answer there. It answered on a separate thread of its own creation ("Response to Request for Assistance"), transmitting a detached, standalone update rather than a reply in line — as though a demand served on a specific date could be discharged by a message placed somewhere else. *It does not work*. The demand and the refusal belong on the same documentary record, and any attempt to place them on separate threads is an attempt to prevent the demand from being read alongside the refusal. The full correspondence has been consolidated, time-stamped, and preserved; this notice memorializes both the demand and the thread-shift. A formal litigation hold attaches to every message, header, thread, and metadata field in the Office's possession touching Case No. 23 CF 1146, the federal actions (Nos. 1:26-cv-06738, 1:26-cv-01077), and all communications about the representation status. Any deletion, alteration, or further off-thread routing implicates 18 U.S.C. § 1519 and Fed. R. Civ. P. 37(e). An answer delivered off the demand thread does not erase the demand; it operates as an admission of the matters the Office declined to address in line.

IV. THE DEFAULT — AND WHY THE CLIENT NO LONGER DEPENDS ON IT

On June 15, 2026, Petitioner served a written Rule 1.16(d) and Rule 13(c) demand (Ex. B). It enclosed the pre-drafted emergency motion and proposed order — the complete legal instrument, ready for signature, ready for filing. It set a single, non-delegable deadline: **June 16, 2026, 5:00 PM CDT**. The act demanded was ministerial: sign the motion that would cure the docket lockout the Office's own counsel-of-record status created, and file it on the docket. Nothing more. **The deadline passed. Nothing was filed.** Rule 1.16(d) is explicit: even on withdrawal, a lawyer "shall take steps to the extent reasonably practicable to protect a client's interests." The Office did neither the cure nor the withdrawal. It had the instrument. It had the deadline. It had the court's attention. *It filed nothing*. Petitioner has since done for himself what the Office would not: he has prepared, noticed, and filed his own Emergency Motion to Stay the Zero-Bond Warrant (Ex. D), served with this notice. The cure no longer depends on the Office. What remains is the one act the client cannot perform for himself — the withdrawal of the Office's own appearance. And the Office's continued failure to perform even that single act — after written notice, a stated rule, a pre-drafted instrument, and a live warrant — is no longer administrative neglect. *It is the*

willful facilitation of a continuing constitutional deprivation. It is joined as an active vector in the pending Chancery mandamus and the federal § 1983 action (No. 1:26-cv-06738).

V. PETITIONER IS PROCEEDING ON HIS OWN — THE OFFICE IS NOT HIS COUNSEL AND SHALL NOT APPEAR AS SUCH

Petitioner is not waiting for the Office. He has prepared, noticed, and filed his own motion — served herewith as **Exhibit D** — a complete emergency packet: Notice of Motion setting a hearing for **June 17, 2026, at 9:00 a.m.** in Courtroom T-611; the Emergency Motion to Stay Execution of the Zero-Bond Warrant, supported by citation to *Bearden, Franks*, and this Court's inherent authority; a one-page [Proposed] Order built for the judge's signature; and a Certificate of Service. He will appear **telephonically** via the Court's authorized line: Dial-in (312) 626-6799, Meeting ID 835 2271 3472, Passcode 206126. The Office is served with that motion by this transmission so there can be no claim of surprise, no further ex parte communication, and no appearance made on his behalf. Because the Office has disclaimed representing Petitioner — *twice*, in writing, and confirmed it to the judge — it **shall not appear as his counsel**, shall not speak for him, and shall not address the Court about his case in his absence. *Its only remaining role is to remove its own appearance from the docket*. The motion is filed, the hearing is set, and the client will speak for himself.

VI. TO THE CLERK OF THE CIRCUIT COURT

The Clerk has refused Petitioner's pro se filings on a single stated basis: that the Public Defender's Office is counsel of record. The Office has now admitted, in writing, that the presiding judge acknowledged Petitioner's pro se status on the record (Ex. A). That admission removes the sole administrative bar the Clerk has cited. There is no longer any basis for refusing a filing from a self-represented litigant whose pro se status has been judicially confirmed. The Clerk is respectfully directed to process Petitioner's portal submission (Ex. D) **upon receipt** and to record his telephonic appearance parameters on the docket. A self-represented litigant's filings **must** be accepted. *Snyder v. Nolen*, 380 F.3d 279 (7th Cir. 2004) (the clerk's duty to file is ministerial). A ministerial duty does not require a court order to perform; it requires only the recognition that the condition the clerk deemed absent— a licensed attorney—has been dispensed with by the court's own acknowledgment.

VII. WHAT THE OFFICE MUST DO, AND BY WHEN

1. **Within twenty-four (24) hours, FILE a motion to withdraw of record under Supreme Court Rule 13(c)** that affirmatively clears the "PD APPOINTED" counsel-of-record designation from the docket in Case No. 23 CF 1146. This is the one act only the Office can perform, and it is the cure for the lockout the Office created.
2. **Do not appear as Petitioner's counsel** at the June 17, 2026 hearing or at any setting, do not speak for him, and make no further off-thread or ex parte communication about his case in his absence.

3. **Preserve** every email thread, header, attachment, and metadata field in the Office's possession touching this matter, consistent with the litigation hold stated above.
4. **Govern accordingly.** The Office's failure to withdraw will be documented as the continued willful maintenance of the docket lockout and joined in the mandamus and § 1983 proceedings, and supplemented to the pending ARDC matters — not as threat, but as the natural consequence the record will record.

/s/ Ehab Allababidi

EHAB ALLABABIDI, Defendant, *Pro Se*

8516 W. Winona St., Chicago, IL 60656

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

Dated: June 16, 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 exhibits attached.

/s/ Ehab Allababidi

EXHIBIT A

RUSSELL CONFIRMS NON-REPRESENTATION & EX PARTE HEARING COMMUNICATION

Email, June 16, 2026, 3:52 PM CT (7:52 PM ET header; VPN timezone)— the Office's own admission

FINAL NOTICE & DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

Document:	Email transmission — Bailey C. Russell to Petitioner, cc Gregory C. Ticsay	Dated:	June 16, 2026, 3:52 PM CT (7:52 PM ET header; VPN timezone; sent at 3:52 CT); June 15, 2026, 2:24 PM CT
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	The closed loop and the ex parte communication, in the Office's own words

WHY THIS EXHIBIT MATTERS:

Russell writes that Petitioner “has not been represented by the Lake County Public Defender's office since October 6, 2025” and that “This was confirmed today in court by the Judge,” then states “The Court is motioning up your case for next week.” In the Office's own words: it disclaimed representation to the client, confirmed that disclaimer to the judge in the client's absence, and a hearing was set without his notice or participation — while a zero-bond warrant ran against him.

KEY POINTS:

- Office's admission of non-representation since October 6, 2025
- “This was confirmed today in court by the Judge” — ex parte, client absent
- “The Court is motioning up your case for next week” — setting made in his absence
- Reply routed on a separate thread from the operative Rule 13(c)/1.16(d) demand



Ehab Hilfiger <defcon5ready@gmail.com>

Re: Response to Request for Assistance

1 message

Bailey Russell <BRussell@lakecountyl.gov>
To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>
Cc: "Gregory C. Ticsay" <GTicsay@lakecountyl.gov>

Tue, Jun 16, 2026 at 7:52 PM

Dear Ehab,

We are correct in our assertion that you have not been represented by the Lake County Public Defender's office since October 6, 2025. This was confirmed today in court by the Judge.

The Court is motioning up your case for next week in order for you to appear. If you wish to ask for the appointment of the Public Defender at that time, you may do so, however, we do not currently represent you.

Sincerely,

Bailey C. Russell

From: Bailey Russell <BRussell@lakecountyl.gov>
Sent: Monday, June 15, 2026 2:24 PM
To: defcon5ready@gmail.com <defcon5ready@gmail.com>
Cc: Gregory C. Ticsay <GTicsay@lakecountyl.gov>
Subject: Response to Request for Assistance

Dear Ehab,

We have reviewed our records that show that you proceeded pro se on October 6, 2025.

Since that date our office has not been reappointed to represent you. This is the reason we have not responded. We do not represent you at this time.

Regarding the clerk refusing to accept your pleadings, the clerk is incorrect in believing that we are the attorney of record at this time.

Sincerely,

Bailey C. Russell

EXHIBIT B

RULE 13(c) & RULE 1.16(d) DEMAND TO CURE DOCKET LOCKOUT

Email, June 15, 2026 — pre-drafted cure motion enclosed; 5:00 PM June 16 deadline set

FINAL NOTICE & DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

Document:	Email transmission — demand to cure with pre-drafted filing enclosed	Dated:	June 15, 2026 — to BRussell@ and GTicsay@lakecountyil.gov
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	The deadline the Office defaulted on

WHY THIS EXHIBIT MATTERS:

This is the written demand that set the June 16, 2026, 5:00 PM CDT deadline for the Office to perform a single ministerial act — sign and file the enclosed emergency motion — to cure the docket lockout its counsel-of-record status created. The deadline passed and nothing was filed. It frames the Office's affirmative, non-delegable duty under Rule 1.16(d) and Supreme Court Rule 13(c).

KEY POINTS:

- Sets a hard deadline of June 16, 2026, 5:00 PM CDT
- Encloses the pre-drafted emergency motion and proposed order — ready to sign and file
- States the Office's non-delegable duty under Rule 1.16(d) and Rule 13(c)
- Deadline passed — motion never filed



Ehab Hilfiger <defcon5ready@gmail.com>

RULE 13(c) & RULE 1.16(d) DEMAND TO CURE DOCKET LOCKOUT (Case No. 23 CF 1146)

1 message

Ehab Hilfiger <defcon5ready@gmail.com>

Mon, Jun 15, 2026 at 11:45 PM

To: Bailey Russell <BRussell@lakecountyil.gov>, "Gregory C. Ticsay" <GTicsay@lakecountyil.gov>

Cc: humanresources@lakecountyil.gov, judicialhr@lakecountyil.gov, information@iadc.org, Circuit Clerk

<CircuitClerk@lakecountyil.gov>

ATTN: Hanna Becerra (Criminal/Traffic Court Services) & Erin Cartwright-Weinstein (Clerk of the Circuit Court)

Ms. Russell,

After ignoring my urgent request for assistance on May 29, 2026, for seventeen days while an active zero-bond warrant executed against my liberty, your June 15 email stating that you do not represent me and that the Clerk is "incorrect" is an administrative admission of a docket error.

However, internal correspondence does not alter the tribunal's operative record. The Clerk (copied here) continues to enforce a docket lockout—refusing my *pro se* filings on the sole basis of your office's lingering designation as counsel of record. While you debate the Clerk's accuracy, a zero-bond warrant reciting "PD APPOINTED" remains outstanding.

Under Illinois Rule of Professional Conduct 1.16(d) and Supreme Court Rule 13(c), you have an affirmative, non-delegable duty to correct the record you abandoned. Pointing at the Clerk does not discharge this duty. Only a docketed motion to withdraw can break this closed loop.

To eliminate any administrative burden, I have drafted the required Rule 13(c) Emergency Motion for Withdrawal and the [Proposed] Order. It contains only the facts you have already conceded in writing. It is attached to this transmission.

You and Chief Ticsay are directed to sign and file this motion no later than 5:00 p.m. CDT on Tuesday, June 16, 2026. This demand has been concurrently executed via facsimile to both your office and the Clerk; transmission receipts are attached.

Failure to execute this single ministerial act transitions your posture from administrative neglect to the willful facilitation of a constitutional deprivation, which will be immediately joined to the pending Chancery mandamus and federal § 1983 litigation.

Govern yourselves accordingly.

Ehab Allababidi Defendant, *Pro Se*

--

**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.



RULE_116_DEMAND_RUSSELL.pdf

385K

EXHIBIT C

ZERO-BOND BENCH WARRANT — RECITES “PD APPOINTED”

Issued May 28, 2026 — the docket designation at the center of the lockout

FINAL NOTICE & DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

Document:	Bench warrant — 19th Judicial Circuit, Lake County	Dated:	Issued May 28, 2026
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	Documentary proof that the Office is counsel of record on the warrant's face

WHY THIS EXHIBIT MATTERS:

The warrant recites “PD APPOINTED” on its face. That is the designation the Office now disclaims to the client and to the court, yet has never moved to clear from the docket — the designation that the Clerk invokes to refuse Petitioner's pro se filings. It is the physical proof of the closed loop, and it is the live warrant against which all of this plays out.

KEY POINTS:

- Recites “PD APPOINTED” — the Office as counsel of record
- Zero-bond: immediate custodial seizure upon any encounter
- Never cleared from the docket despite the Office's disclaimer of representation
- The live consequence the Office was repeatedly asked to help recall



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

THE PEOPLE OF THE STATE OF ILLINOIS

CASE
NUMBER(S)

23CF00001146

VS.

EHAB ALLABABIDI
8516 W. WINONA ST.
CHICAGO, IL 60656

WARRANT OF ARREST - VIOLATION

To all Peace Officers of the State of Illinois:

You are hereby commanded to arrest **EHAB ALLABABIDI** and bring said person without unnecessary delay before the judge sitting in First Appearance Court in the Circuit Court of the 19th Judicial Circuit, Lake County, Illinois, to answer a charge made against said person for a technical violation while on for the following offense(s):

AGG RECKLESS DRVG/BODILY HARMSPEEDING 35+ MPH OVER LIMIT

The defendant shall be held in custody for First Appearance Court.

Issued at Lake County, Illinois on 05/28/2026

JUDGE

PD APPOINTED
ARRESTING
AGENCY:
Lincolnshire



DOB: 09/24/1996	Race:	Sex: Male	Hair: Brown	Eyes: Brown	HGT: 6	WGT: 200
Driver's License: A41120096272	DL State: IL	SSN:	State ID:			
Vehicle Reg:	Veh Make:	Year:	License Plate:			

EXHIBIT D

EMERGENCY MOTION TO STAY THE ZERO-BOND WARRANT — FULL PACKET, SERVED HEREWITH

Notice, Emergency Motion, one-page [Proposed] Order & Proof of Service — set for June 17, 2026, 9:00 a.m.

FINAL NOTICE & DEMAND — LAKE COUNTY PUBLIC DEFENDER'S OFFICE

Document:	Emergency motion packet (5 pp) — Notice of Motion, Emergency Motion to Stay, [Proposed] Order, Certificate of Service	Dated:	Filed and served June 16, 2026 — set for hearing June 17, 2026, 9:00 a.m., Courtroom T-611
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	The interim relief the Office should have sought; the Office and the State are served with it by this transmission

WHY THIS EXHIBIT MATTERS:

This is the complete emergency motion the Office was repeatedly asked to file and would not: a Notice of Motion setting the matter for June 17, 2026 at 9:00 a.m.; an Emergency Motion to Stay Execution of the Zero-Bond Warrant pending the hearing on Petitioner's Motion to Quash; a one-page [Proposed] Order built to be signed; and a Certificate of Service. It identifies the Courtroom T-611 telephonic credentials (Dial-in (312) 626-6799, Meeting ID 835 2271 3472, Passcode 206126) by which Petitioner will appear. It is attached here so that, by this transmission, the Office and the State are served with it under Ill. S. Ct. R. 11(c).

KEY POINTS:

- Notice of Motion set for June 17, 2026, 9:00 a.m., Courtroom T-611 (telephonic)
- Emergency Motion to Stay the May 28, 2026 warrant pending the Motion to Quash
- One-page [Proposed] Order — built to be signed
- Certificate of Service (Ill. S. Ct. R. 11(c) / 12) — email + Lake County portal upload

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

v.

EHAB ALLABABIDI,
Defendant, Pro Se.

General No.: **23 CF 1146**

Circuit Court, 19th Judicial Circuit
Lake County, Illinois

Judge: **HON. CHRISTOPHER R. STRIDE**
Courtroom: **T-611**

NOTICE OF MOTION — EMERGENCY

Emergency Motion to Stay Execution of the Zero-Bond Warrant Pending Hearing

TO: Nicholas Shepherd, Assistant State’s Attorney (nshepherd@lakecountyil.gov); Lake County Public Defender’s Office — Gregory C. Ticsay (GTicsay@lakecountyil.gov) and Bailey C. Russell (BRussell@lakecountyil.gov); and the Clerk of the Circuit Court of Lake County (CircuitClerk@lakecountyil.gov; Lake County Court Portal).

PLEASE TAKE NOTICE that on **June 17, 2026, at 9:00 a.m.**, or as soon thereafter as the matter may be heard, the undersigned Defendant, appearing *pro se*, will appear before the Honorable Christopher R. Stride at the 9:00 a.m. call of Courtroom T-611 and present the attached **EMERGENCY MOTION TO STAY EXECUTION OF THE ZERO-BOND WARRANT PENDING HEARING**, together with a one-page [Proposed] Order, a copy of each being served upon you herewith. Defendant will appear **telephonically** via the Court’s authorized infrastructure for Courtroom T-611 (Dial-in (312) 626-6799, Meeting ID 835 2271 3472, Passcode 206126).

This matter is presented on an **emergency basis and shortened notice** because the zero-bond warrant is active **today** and Defendant may be taken into custody at any moment — including before his Emergency Motion to Quash can be heard the week of June 22, 2026. The Clerk and Court Coordinator are requested to confirm the 9:00 a.m. setting and transmit verified remote-access credentials to defcon5ready@gmail.com forthwith.

Respectfully submitted,

/s/ Ehab Allababidi

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

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

v.

EHAB ALLABABIDI,
Defendant, Pro Se.

General No.: **23 CF 1146**

Circuit Court, 19th Judicial Circuit
Lake County, Illinois

Judge: **HON. CHRISTOPHER R. STRIDE**
Courtroom: **T-611**

**EMERGENCY MOTION TO STAY EXECUTION OF THE
ZERO-BOND WARRANT PENDING HEARING**

Submitted Pro Se — Interim Relief Only, Pending the Hearing on Defendant’s Motion to Quash

EMERGENCY NATURE OF THIS MOTION.

A zero-bond bench warrant issued May 28, 2026 is **active now**; armed officers attempted to execute it at Defendant’s residence on June 6, 2026. Defendant has a separate Emergency Motion to Quash that warrant, which the Court has set to be heard the week of June 22, 2026. Without an immediate stay, Defendant can be arrested at any time during the intervening week — including on his way to the very hearing at which the warrant would be quashed — which would moot that hearing and inflict the exact harm the quash motion seeks to prevent. This motion asks only for **interim protection**: a stay of execution until the quash motion is heard.

BACKGROUND.

1. Defendant has proceeded *pro se* since October 6, 2025. The Lake County Public Defender’s Office confirmed in writing on June 16, 2026 that it does not represent him, and the Court acknowledged his *pro se* status on the record that day.
2. The zero-bond warrant issued May 28, 2026 recites “PD APPOINTED” on its face, and the Circuit Clerk has refused Defendant’s *pro se* filings on the ground that the Public Defender’s Office remains counsel of record — an office that disclaims representing him.
3. Defendant’s Emergency Motion to Quash the warrant (filed separately) is set for hearing the week of June 22, 2026. This stay is sought solely to preserve that hearing from being mooted by an intervening arrest.

ARGUMENT.

A. The Court has inherent authority to stay execution of its own warrant. A court retains control over its own process and may recall or stay execution of a bench warrant it has issued. A brief interim stay — lasting only until the already-scheduled quash hearing — is the most modest exercise of that authority, and it preserves rather than alters the status quo.

B. A stay is necessary to protect the Court’s own hearing and Defendant’s right to be heard. Due process guarantees a meaningful opportunity to be heard, *Morrissey v. Brewer*, 408 U.S. 471 (1972), and the Sixth Amendment guarantees Defendant the right to conduct his own defense, *Faretta v. California*, 422 U.S. 806 (1975). Both are defeated if Defendant is taken into custody on the warrant before the quash motion is heard. The State suffers no prejudice from a one-week stay: the matter is already set, and Defendant is not a flight risk — he is the party seeking the hearing.

RELIEF REQUESTED.

1 Defendant respectfully requests that the Court enter the attached one-page [Proposed] Order: (1)
2 staying execution of the May 28, 2026 zero-bond warrant until the hearing on Defendant’s Emergency
3 Motion to Quash; (2) directing the Clerk to notify the Lake County Sheriff and the Illinois State Police that
4 no arrest shall be made under the warrant pending that hearing; (3) recognizing Defendant’s pro se status
5 and directing the Clerk to accept his filings; and (4) granting leave to appear by telephone and directing
6 transmission of verified credentials at least 48 hours before any setting.

7 **VERIFICATION (735 ILCS 5/1-109).** Under penalties as provided by law pursuant to Section 1-109 of the
8 Code of Civil Procedure, the undersigned certifies that the statements set forth in this Motion are true and
9 correct, except as to matters stated on information and belief, and as to such matters the undersigned certifies
10 that he verily believes the same to be true.

11 Respectfully submitted,

12 /s/ Ehab Allababidi

13 **EHAB ALLABABIDI**, Defendant, Pro Se
14 8516 W. Winona St., Chicago, IL 60656
15 (773) 920-0030 | defcon5ready@gmail.com
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**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

v.

EHAB ALLABABIDI,
Defendant, Pro Se.

General No.: **23 CF 1146**

Circuit Court, 19th Judicial Circuit
Lake County, Illinois

Judge: **HON. CHRISTOPHER R. STRIDE**
Courtroom: **T-611**

[PROPOSED] ORDER STAYING EXECUTION OF THE ZERO-BOND WARRANT

Interim Relief Pending the Hearing on Defendant's Emergency Motion to Quash

THIS MATTER coming before the Court on Defendant's Emergency Motion to Stay Execution of the Zero-Bond Warrant Pending Hearing, Defendant appearing *pro se*, due notice having been given, and the Court being fully advised, **IT IS HEREBY ORDERED:**

- 1. Warrant Execution STAYED.** Execution of the zero-bond bench warrant issued May 28, 2026 in this cause is STAYED until the hearing on Defendant's Emergency Motion to Quash, set for the week of June 22, 2026. No arrest or detention shall be made under this warrant pending that hearing.
- 2. Law-Enforcement Notice.** The Clerk shall immediately transmit notice of this stay to the Lake County Sheriff and the Illinois State Police, directing that the warrant not be executed pending further order of the Court.
- 3. Pro Se Status Recognized.** Defendant is recognized as proceeding *pro se*, effective October 6, 2025. The Clerk shall accept and docket Defendant's submissions without requiring an attorney's signature block as a condition of filing.
- 4. Remote Appearance.** Defendant is granted leave to appear by telephone or video. The Clerk and Court Coordinator shall transmit verified remote-access credentials, and the date and time of the hearing, to defcon5ready@gmail.com no later than forty-eight (48) hours in advance.

ENTERED: _____

HON. CHRISTOPHER R. STRIDE

Circuit Judge, 19th Judicial Circuit, Lake County, Illinois

*Prepared and submitted by Ehab Allababidi, Defendant, Pro Se — 8516 W. Winona St., Chicago, IL 60656 —
defcon5ready@gmail.com*

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS — CRIMINAL DIVISION**

THE PEOPLE OF THE STATE OF ILLINOIS,
Plaintiff,

v.

EHAB ALLABABIDI,
Defendant, Pro Se.

General No.: **23 CF 1146**

Circuit Court, 19th Judicial Circuit
Lake County, Illinois

Judge: **HON. CHRISTOPHER R. STRIDE**
Courtroom: **T-611**

CERTIFICATE OF SERVICE

The undersigned certifies that on June 16, 2026, he served the foregoing **Notice of Motion, Emergency Motion to Stay Execution of the Zero-Bond Warrant Pending Hearing,** and **[Proposed] Order** by electronic mail upon the persons listed below. **Service by electronic mail is an authorized and the default manner of service under Illinois Supreme Court Rule 11(c),** and proof of service is made under Illinois Supreme Court Rule 12. The foregoing documents were additionally tendered for filing of record through the Lake County Court electronic portal, including the **[Proposed] Order** submitted via the portal's proposed-order upload:

- **Nicholas Shepherd,** Assistant State's Attorney, Lake County — nshepherd@lakecountyil.gov
- **Gregory C. Ticsay,** Chief Public Defender — GTicsay@lakecountyil.gov
- **Bailey C. Russell,** Assistant Public Defender — BRussell@lakecountyil.gov
- **Clerk of the Circuit Court of Lake County** — CircuitClerk@lakecountyil.gov; and tendered via the Lake County Court Portal for filing of record

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure and 28 U.S.C. § 1746, the undersigned certifies that the foregoing is true and correct.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, Defendant, Pro Se
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