

LAKE COUNTY PUBLIC DEFENDER'S OFFICE

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

FACSIMILE & EMAIL TRANSMISSION — FAX: (847) 984-5751 — 15 S. County St., Waukegan, IL 60085

TIME-SENSITIVE — RESPONSE REQUIRED BY 5:00 p.m. CDT on Tuesday, June 16, 2026

DEMAND TO CLEAR THE RECORD — FILE A MOTION TO WITHDRAW

Your Office's own email admits the Clerk is wrong; the pre-drafted motion is enclosed

TO:	Bailey C. Russell, Appointed Counsel of Record Lake County Public Defender's Office 15 S. County St., Waukegan, IL 60085 — Fax: (847) 984-5751 BRussell@lakecountyil.gov
AND:	Gregory C. Ticsay, Chief Public Defender (supervisory, Ill. R.P.C. 5.1) GTicsay@lakecountyil.gov
CC:	Erin Cartwright-Weinstein, Clerk of the Circuit Court, & Hanna Becerra, Criminal/Traffic Court Services (Fax (847) 984-5822; CCNoReply@lakecountyil.gov) — defendants in the pending mandamus, Allababidi v. Weinstein & Becerra; Attorney Registration & Disciplinary Commission; Lake County Risk Management; filed of record, No. 1:26-cv-06738 (N.D. Ill.)
FROM:	Ehab Allababidi, Defendant, Pro Se (Faretta invoked) 8516 W. Winona St., Chicago, IL 60656 (773) 920-0030 — defcon5ready@gmail.com
CASE:	23 CF 1146 — People v. Allababidi, 19th Judicial Circuit, Lake County Related: 1:26-cv-06738 (N.D. Ill.); habeas 1:26-cv-01077; pending Petition for Writ of Mandamus
DATE:	June 15, 2026
RESPONSE BY:	5:00 p.m. CDT on Tuesday, June 16, 2026
RE:	DEMAND that your Office file ON THE 23 CF 1146 DOCKET, by the deadline, a motion to withdraw under Ill. S. Ct. Rule 13(c). I have prepared the motion for you — Exhibit D. This is the ONLY act that breaks the closed loop: the Clerk refuses my pro se filings and directs me to “reach out to your public defender” (Ex. C); your Office says it does not represent me and calls the Clerk “incorrect” (Ex. A) — yet files nothing. I cannot file a motion to cure this myself, because every pro se filing is refused. Only your Office can file. A zero-bond warrant reciting “PD APPOINTED” (Ex. B) runs in the meantime.
PAGES:	Pages: 19 (incl. this cover)

Your office's own email is the admission:

The Clerk (Becerra, June 8, 2026) refused my pro se filings, stating the motion must be filed by my attorney and directing me to “reach out to your public defender” (Ex. C). Your Office (Russell, June 15, 2026, cc Chief Ticsay) replied that it does not represent me and that “the clerk is incorrect in believing that we are the attorney of record” (Ex. A). Each of you points to the other; I am trapped in the middle with a zero-bond warrant reciting “PD APPOINTED” (Ex. B). I cannot file the paper that fixes this, because the Clerk refuses every pro se filing I tender. Only your Office can break the loop. I have invoked Faretta. File one paper on the docket by the deadline and this is resolved.

Your Office has said, in writing, that the Clerk is wrong. On June 15, 2026, appointed counsel Bailey C. Russell wrote—copying Chief Public Defender Gregory C. Ticsay—that “the clerk is incorrect in believing that we are the attorney of record at this time.” (Ex. A.) That single sentence is the document from which this demand proceeds. It concedes three things at once: that the Clerk treats your Office as counsel of record; that your Office knows the Clerk is wrong; and that your Office has corrected nothing. The result is a closed loop with my liberty caught inside it: I have invoked Faretta, yet I cannot file a single paper in my own defense, while a zero-bond warrant reciting “PD APPOINTED” (Ex. B) remains outstanding against me.

I. THE OFFICE’S WRITTEN ADMISSION

Ms. Russell’s email states, verbatim: “We do not represent you at this time” and “the clerk is incorrect in believing that we are the attorney of record at this time.” (Ex. A.) The email is preserved and is being filed of record in *Allababidi v. Shepherd*, No. 1:26-cv-06738 (N.D. Ill.).

The admission is dispositive of intent. Your Office does not dispute that the Clerk is refusing my pro se filings; it says the Clerk is wrong. Your Office has therefore known, in writing, that an erroneous record is locking me out of the courthouse—and has done nothing to correct it. Knowledge plus inaction is not negligence; it is the *conscious selection* of a course whose consequence is a continuing constitutional deprivation.

II. THE CLOSED LOOP — AN IRRECONCILABLE CONFLICT

This is not a disagreement I can litigate my way out of; it is a closed loop, documented from both sides. On **June 8, 2026**, the Clerk’s office refused my tendered pro se Appearance, Motion to Quash, and Petition, writing: “the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call.” (Ex. C.) One week later, on **June 15, 2026**, your Office wrote the opposite: “We do not represent you.” (Ex. A.) The Clerk sends me to the Public Defender; the Public Defender says the Clerk is wrong—and files nothing. Each office points to the other; I am *trapped between them* with a zero-bond warrant executing against me.

Critically, I cannot file my way out of this loop. Every remedy that would ordinarily fix it—an appearance, a motion to substitute, a motion to strike the Office’s status, the motion to quash the warrant itself—requires a filing, and the Clerk refuses every pro se filing I tender on the very ground in dispute. The *only* actor who can break the loop is the one the Clerk recognizes: your Office. That is the reason this demand exists: because *no motion I can write will be docketed* until your Office’s name is cleared from the record only your Office can clear.

III. THE RECORD GOVERNS, NOT CORRESPONDENCE

Under Illinois Supreme Court Rule 13(c), an attorney of record may be relieved only by filing a motion and giving notice, with leave of court. Representation status before the tribunal is governed by the docket, not by correspondence to the client. Whatever your Office’s internal records say, the operative record of the court—the record the Clerk and the Sheriff act upon—is what controls who may file and who is subject to process. That operative record shows your Office as counsel: the Clerk refuses my filings on that basis (Ex. C), and the May 28, 2026 Warrant of Arrest recites “PD APPOINTED” (Ex. B). Until your Office files the required motion on the 23 CF 1146 docket, the lockout persists no matter how many emails are sent.

IV. THE DUTY TO CURE — RULE 1.16(d)

Even on your Office’s own theory that the representation has ended, Illinois Rule of Professional Conduct 1.16(d) requires a lawyer, upon termination, to take steps reasonably practicable to protect the client’s interests. Where your Office’s lingering record-status is the sole barrier the Clerk cites for refusing my filings, the reasonably practicable step is obvious, immediate, and costs *one page*. The duty does not turn on whether your Office believes it currently represents me. It turns on the fact that the court’s record names your Office, and only your Office can readily correct what only your Office created. A duty whose performance requires *nothing more than a signature* and a filing is not a duty that admits of delay.

V. THE HARM — DENIAL OF ACCESS WHILE A WARRANT EXECUTES

A self-represented litigant has a clearly established right of access to the courts. *Bounds v. Smith*, 430 U.S. 817 (1977); see *Faretta v. California*, 422 U.S. 806 (1975) (Sixth Amendment right to proceed pro se). The Clerk’s refusal to docket my filings—on the basis your own email calls erroneous—denies me that access at the precise moment my liberty is at stake. I cannot move to quash the May 28, 2026 zero-bond warrant, or otherwise defend myself, because the Clerk will not accept a filing from a defendant the record still shows as represented by your Office (Ex. C). Your administrative inaction is the proximate cause of that lockout. The warrant is *not a paper threat*; it is a no-bond custodial instrument entered into LEADS/NCIC, and it is being actively executed. On June 6, 2026, police extraction teams attempted forced entry at my residence at 1:03 PM and again at 5:51 PM.

VI. THE DEMAND — FILE A MOTION TO WITHDRAW ON THE DOCKET BY THE DEADLINE

No later than **5:00 p.m. CDT on Tuesday, June 16, 2026**, your Office (Ms. Russell or, in her stead, Chief Ticsay) shall file **on the 23 CF 1146 docket** — not by email to me, not by letter to the Clerk, but by a filing that the tribunal can act upon — a motion to withdraw under Illinois Supreme Court Rule 13(c), relieving your Office as counsel of record and confirming that I proceed pro se. No other paper will be accepted as compliance. A notice that does not move the Court for relief leaves the docket lockout intact. Only a motion that the Court can grant breaks the loop.

Exhibit D — Pre-Drafted Filing Enclosed. To eliminate any conceivable administrative burden, I have prepared the required motion and attached it as Exhibit D. The accompanying [Proposed] Order Granting Withdrawal is attached as Exhibit F with its own cover page, ready for the Court's signature. Your compliance requires nothing more than *your signature* and electronic transmission to the Clerk. If you refuse to sign and file a pre-drafted motion that merely confirms your own stated position, your inaction transitions from administrative neglect to *willful, intentional obstruction* of a federal litigant's constitutional rights. I do not make that observation lightly; I make it because the record will not permit any other conclusion.

VII. CONSEQUENCES OF DEFAULT

Because I cannot file to cure this myself, the cure must come from your Office or from a court compelling the Clerk. If your Office does not act by the deadline, I will pursue every remedy that does not depend on the Clerk accepting my pro se filings:

Mandamus and Joinder (Already Pending). The docket lockout is actively before the Chancery Division in *Allababidi v. Weinstein & Becerra*, my Petition for Writ of Mandamus to compel the Clerk's ministerial duty to docket pro se filings. If you refuse to file the motion by the deadline, I will immediately move to join you and Chief Ticsay as necessary and indispensable parties under 735 ILCS 5/2-405, on the ground that your Office's lingering record-status is the operative mechanism the Clerk is utilizing to justify the lockout. You will be forced to explain your refusal to file a withdrawal directly to the Chancery judge.

ARDC Referral. I will file a request for investigation with the Attorney Registration and Disciplinary Commission for the failure to discharge the duties imposed by Ill. R.P.C. 1.16(d) and Illinois Supreme Court Rule 13(c), with a separate supervisory referral to Chief Ticsay under Rule 5.1. An ARDC complaint is filed with the Commission, not with the Clerk; it is not blocked by the lockout.

Federal Record and Exposure — Joint Action. To the extent the refusal to clear the record is an administrative act outside the shield of *Polk County v. Dodson*, 454 U.S. 312 (1981), your conduct triggers the Joint Action Doctrine. Under *Dennis v. Sparks*, 449 U.S. 24 (1980), a private party or immune actor who willfully participates in joint action with a state official (the Circuit Clerk) to deprive an individual of constitutional rights acts under color of state law. By acknowledging the Clerk's unconstitutional lockout (Ex. A) and refusing to execute the single ministerial filing required to cure it, you are engaged in active, joint facilitation of a First and Fourteenth Amendment deprivation. I will move for leave under Fed. R. Civ. P. 15(a) to add you and Chief Ticsay in your individual capacities to the pending federal action, No. 1:26-cv-06738 (N.D. Ill.). I state this consequence precisely, and *claim no more than the law allows*.

Voiding of Indemnification. Lake County Risk Management is copied on this demand to establish actual notice that your continued refusal to clear the docket constitutes an intentional, willful administrative omission. Willful violations of the Rules of Professional Conduct and deliberate facilitation

of a constitutional deprivation fall outside the scope of municipal indemnification under Illinois law. Any resulting federal damages will attach to you personally.

VIII. PRESERVATION

You and your Office are directed to preserve all records relating to my representation status, the appointment and any discharge of the Public Defender, and all communications with the Clerk concerning the docketing of my filings. The June 15, 2026 email is preserved and authenticated as Exhibit A.

IX. INDEX OF EXHIBITS

Exhibit A — Email of Bailey C. Russell, June 15, 2026 — “We do not represent you”; “the clerk is incorrect.” **Exhibit B** — Warrant of Arrest — Violation, May 28, 2026, reciting “PD APPOINTED” **Exhibit C** — Clerk’s refusal email, June 8, 2026 — “the motion must be filed by your attorney.” **Exhibit D** — Pre-drafted Emergency Motion for Withdrawal (Rule 13(c)) — prepared for signature by Bailey C. Russell. **Exhibit E** — Defendant’s Urgent Request for Assistance, May 29, 2026 — “I am writing to respectfully request your immediate assistance.” — the initiating email your Office ignored for seventeen days. **Exhibit F** — [Proposed] Order Granting Withdrawal of Counsel — for the judge’s signature; submitted with Exhibit D.

Respectfully but firmly,

/s/ Ehab Allababidi

EHAB ALLABABIDI, Defendant, Pro Se (Faretta invoked)

8516 W. Winona St., Chicago, IL 60656

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

Dated: June 15, 2026

EXHIBIT A

Email of Appointed Counsel Bailey C. Russell

June 15, 2026 — cc Chief Public Defender Gregory C. Ticsay

Document:	Email (BRussell@lakecountyil.gov)	Filed/Dated:	June 15, 2026, 7:24 p.m.
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	Written admission of the docket lockout

LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE

This is the Office's own admission. It concedes the Clerk treats the Office as counsel of record, calls the Clerk "incorrect", and yet announces no corrective filing — establishing knowledge and inaction in a single document.

KEY EVIDENCE CONTAINED IN THIS EXHIBIT

- "We do not represent you at this time."
 - "the clerk is incorrect in believing that we are the attorney of record at this time."
 - Copied to Chief Public Defender Gregory C. Ticsay (supervisory notice, Rule 5.1).
-

Rule 13(c) & Rule 1.16 Notice and Demand — Exhibit A — 23 CF 1146 — Ehab Allababidi, Pro Se



Ehab Hilfiger <defcon5ready@gmail.com>

Response to Request for Assistance

1 message

Bailey Russell <BRussell@lakecountyiil.gov>

Mon, Jun 15, 2026 at 7:24 PM

To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>

Cc: "Gregory C. Ticsay" <GTicsay@lakecountyiil.gov>

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

Warrant of Arrest — Violation (Zero-Bond)

May 28, 2026 — Circuit Court of the 19th Judicial Circuit, Lake County

Document:	Warrant of Arrest	Filed/Dated:	May 28, 2026
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	Tribunal's operative record: "PD APPOINTED"

LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE

The warrant commanding my arrest recites "PD APPOINTED" on Case No. 23CF00001146. The court's own process names the Public Defender as counsel while my liberty is taken — the concrete harm a one-page withdrawal cures.

KEY EVIDENCE CONTAINED IN THIS EXHIBIT

- Commands arrest of Ehab Allababidi; held for First Appearance Court.
 - Recites "PD APPOINTED" — Case No. 23CF00001146.
 - Issued 05/28/2026 on the Petition for Revocation alone.
-

Rule 13(c) & Rule 1.16 Notice and Demand — Exhibit B — 23 CF 1146 — Ehab Allababidi, Pro Se



**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 C

Clerk's Written Refusal to Docket Pro Se Filings

June 8, 2026 — Hanna Becerra, for Clerk Erin Cartwright-Weinstein

Document:	Email (CCNoReply@lakecountyil.gov)	Filed/Dated:	June 8, 2026, 6:48 p.m.
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	The other half of the closed loop

LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE

This is the Clerk's side of the irreconcilable conflict. It refuses Mr. Allababidi's tendered pro se Appearance, Motion to Quash, and Petition, and directs him to his public defender — the very office that says it does not represent him (Ex. A). Together, Exhibits A and C are the documented closed loop that only the Public Defender's Office can break.

KEY EVIDENCE CONTAINED IN THIS EXHIBIT

- “the motion must be filed by your attorney.”
- “I would reach out to your public defender to have this matter added to the call.”
- Sender: Clerk of the Circuit Court (Erin Cartwright-Weinstein), per H. Becerra, Criminal/Traffic Court Services — (847) 377-3282.

Rule 13(c) & Rule 1.16 Notice and Demand — Exhibit C — 23 CF 1146 — Ehab Allababidi, Pro Se



Ehab Hilfiger <defcon5ready@gmail.com>

Motion

CC No Reply <CCNoReply@lakecountyil.gov>

Mon, Jun 8, 2026 at 6:48 PM

To: "defcon5ready@gmail.com" <defcon5ready@gmail.com>

Good Afternoon Mr. Allababidi

We have received your email about adding this case to the call for 06/09/2026, Unfortunately we cannot add this case to the call because we do not have the original motion copy and the motion must be filed by your attorney. I would reach out to your public defender to have this matter added to the call.

Thank you.

Hanna Becerra
Criminal/Traffic Court Services Representative
Clerk of The Circuit Court Erin Cartwright-Weinstein
[18 N. County St](#)
Waukegan IL 60085
(847)377-3282

EXHIBIT D

Pre-Drafted Emergency Motion for Withdrawal (Rule 13(c))

Prepared for Bailey C. Russell — June 16, 2026

Document:	Proposed Court Filing (Motion)	Filed/Dated:	June 16, 2026
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	Removes every excuse for non-compliance

LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE

This is the actual motion your Office would sign and file with the Court. It contains: (1) a statement that this Office does not represent Mr. Allababidi and that he proceeds pro se under Faretta; (2) a directive that the Clerk accept his pro se filings without an attorney signature block; (3) a Rule 13(c) motion with good-cause recitation; and (4) a certificate of service. The corresponding [Proposed] Order Granting Withdrawal is a separate exhibit (Exhibit F) with its own cover page, ready for the judge’s signature. Preparing this motion took Mr. Allababidi ten minutes. Your Office’s refusal to sign and file a pre-drafted motion that merely confirms your own stated position is indefensible.

KEY EVIDENCE CONTAINED IN THIS EXHIBIT

- Emergency Motion for Withdrawal under Rule 13(c) confirming pro se status.
- Directs the Clerk to accept Defendant’s pro se filings without attorney signature block.
- [Proposed] Order Granting Withdrawal filed separately as Exhibit F.
- Requires only the attorney’s signature before filing.

Rule 13(c) & Rule 1.16 Notice and Demand — Exhibit D — 23 CF 1146 — Ehab Allababidi, Pro Se

**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.

General No.: **23 CF 1146**

Circuit Court, 19th Judicial Circuit
Lake County, Illinois

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

**EMERGENCY MOTION FOR WITHDRAWAL
Illinois Supreme Court Rule 13(c)**

Submitted by Appointed Counsel Bailey C. Russell, Lake County Public Defender's Office

COMES NOW Bailey C. Russell, appointed counsel of record in the above-captioned matter, and respectfully moves this Court for an order relieving the Lake County Public Defender's Office as counsel of record. In support, counsel states:

- 1.** Defendant Ehab Allababidi invoked his right to self-representation under *Faretta v. California*, 422 U.S. 806 (1975), on October 6, 2025.
- 2.** This Office has not been reappointed to represent Defendant since that date and does not currently represent him. (June 15, 2026 email of B. C. Russell, Ex. A to the Rule 116 Demand.)
- 3.** The Circuit Court Clerk is refusing to accept Defendant's pro se filings on the basis that this Office remains designated as counsel of record on the tribunal's docket. (June 8, 2026 email of H. Becerra, Ex. C to the Rule 116 Demand.) That designation is no longer accurate.
- 4.** Withdrawal is required under Illinois Rules of Professional Conduct 1.16(d) and Illinois Supreme Court Rule 13(c) to align the tribunal's docket with the current status of the representation and to restore Defendant's access to the court for the filing of pro se pleadings.

WHEREFORE, the Lake County Public Defender's Office respectfully requests that this Court grant this Motion, relieve this Office as counsel of record, confirm Defendant's pro se status, and direct the Clerk to accept and docket Defendant's pro se filings.

Respectfully submitted,

Lake County Public Defender's Office

Bailey C. Russell, ARDC No. 6340962
Appointed Counsel of Record
15 S. County St., Waukegan, IL 60085
(847) 984-5751 — BRussell@lakecountyiil.gov
Dated: June 16, 2026

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Emergency Motion for Withdrawal was served upon Defendant Ehab Allababidi via email at defcon5ready@gmail.com on June 16, 2026.

Bailey C. Russell

FILED of record in Case No. 23 CF 1146, 19th Judicial Circuit, Lake County, Illinois.

EXHIBIT E

Defendant’s Urgent Request for Assistance to Appointed Counsel

May 29, 2026 — *Ehab Allababidi to Bailey C. Russell*

Document:	Email (defcon5ready@gmail.com to BRussell@lakecountyil.gov)	Filed/Dated:	May 29, 2026, 5:32 p.m.
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	The initiating request your Office ignored for 17 days

LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE

This is the email Mr. Allababidi sent to Ms. Russell on May 29, 2026 — the day after the warrant issued — respectfully requesting her immediate assistance to review exculpatory evidence and file a motion to quash the warrant. Ms. Russell did not respond for seventeen days. When she finally replied on June 15, 2026 (Exhibit A), she did not offer to file anything. She said her Office does not represent Mr. Allababidi and that the Clerk is incorrect — but filed nothing to correct the record. This email establishes that Mr. Allababidi made a timely, good-faith request for representation before being forced to proceed pro se.

KEY EVIDENCE CONTAINED IN THIS EXHIBIT

- Sent the day after the May 28, 2026 zero-bond warrant issued.
 - Attached federal appellate filings containing exculpatory evidence.
 - Respectfully requested a motion to quash the warrant.
 - No substantive response for seventeen days.
-

Rule 13(c) & Rule 1.16 Notice and Demand — Exhibit E — 23 CF 1146 — Ehab Allababidi, Pro Se



Ehab Hilfiger <defcon5ready@gmail.com>

Urgent Request for Assistance: Active Arrest Warrant (Case 23CF1146)

1 message

Ehab Hilfiger <defcon5ready@gmail.com>
To: Bailey Russell <BRussell@lakecountyl.gov>

Fri, May 29, 2026 at 5:32 PM

Dear Ms. Russell,

I hope you are doing well.

I just contacted the Lake County Public Defender's Office intake desk regarding an active arrest warrant issued today in my case (23CF1146). They informed me that you are the assigned public defender for this matter.

I am writing to respectfully request your immediate assistance. I am physically unable to safely travel to Lake County to surrender. My impossibility of transit is currently the subject of an emergency appeal before the Seventh Circuit Court of Appeals. I urgently need your help to review the exculpatory evidence and file a motion to quash the warrant in my absence.

To save your office time, I have attached my active federal appellate filings, which contain the exact state records proving the drug allegation in the State's petition was already cleared by Cook County Probation as a verified, lawful prescription.

- **Attachment 1:** 26-2133_Documents_2.pdf (Please see Pages 39-44 for the written proof from Cook County Probation clearing the drug test, and Pages 45-48 for the State's Petition).
- **Attachment 2:** NOTICE_OF_PERFECTED_APPEAL_FULL_05292026_3.pdf (Please see Pages 10-11 for the active arrest warrant).

Thank you very much for your time and your dedication to this case. Please let me know the best way to coordinate with you on filing this emergency motion.

Sincerely,

Ehab Allababidi Phone: (773) 920-0030


--

**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.

2 attachments

 **26-2133_Documents.pdf**
1251K

 **NOTICE_OF_PERFECTED_APPEAL_FULL_05292026.pdf**
251K

EXHIBIT F

[Proposed] Order Granting Withdrawal of Counsel

Separate filing for the Court's signature — Exhibit F to Demand

Document:	Proposed Order (for judge signature)	Filed/Dated:	June 16, 2026
Case No.:	23 CF 1146 — People v. Allababidi, 19th Jud. Circuit, Lake County	Relevance:	Completes the withdrawal; judge signs and enters

LEGAL SIGNIFICANCE — WHY THIS EXHIBIT IS DISPOSITIVE

This is the [Proposed] Order corresponding to the Motion for Withdrawal (Exhibit D). It is filed as a separate document so the Court can sign and enter it directly. The order grants the withdrawal, confirms pro se status, directs the Clerk to accept Defendant's filings, corrects the docket, and void the attorney-signature policy as applied. Once signed, the docket lockout is broken by judicial decree.

KEY EVIDENCE CONTAINED IN THIS EXHIBIT

- Grants Motion for Withdrawal and relieves the Public Defender's Office.
- Confirms pro se status under Faretta and directs the Clerk accordingly.
- Corrects the docket to remove the Public Defender's Office as counsel.
- Declares the attorney-signature filing policy void as applied to this Defendant.

Rule 13(c) & Rule 1.16 Notice and Demand — Exhibit F — 23 CF 1146 — Ehab Allababidi, Pro Se

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

THE PEOPLE OF THE STATE OF ILLINOIS, <i>Plaintiff,</i> v. EHAB ALLABABIDI, <i>Defendant.</i>	General No.: 23 CF 1146 Circuit Court, 19th Judicial Circuit Lake County, Illinois Judge: HON. CHRISTOPHER R. STRIDE Courtroom: T-611
--	--

**[PROPOSED] ORDER GRANTING WITHDRAWAL OF COUNSEL
AND DIRECTING CLERK TO ACCEPT PRO SE FILINGS**

THIS CAUSE coming to be heard on the Lake County Public Defender’s Office’s Motion for Withdrawal pursuant to Illinois Supreme Court Rule 13(c); the Court having reviewed the motion and being fully advised in the premises; and the Court finding that Defendant Ehab Allababidi has validly invoked his right to self-representation under *Faretta v. California*, 422 U.S. 806 (1975):

IT IS HEREBY ORDERED:

- 1. Motion GRANTED.** The Lake County Public Defender’s Office is hereby RELIEVED as counsel of record for Defendant Ehab Allababidi in Case No. 23 CF 1146, effective immediately.
- 2. Pro Se Status CONFIRMED.** Defendant Ehab Allababidi shall proceed pro se. The Clerk is DIRECTED to accept, file, and docket all submissions tendered by Defendant without requiring an attorney’s ARDC number, firm name, or signature block as a condition of filing, consistent with *Faretta v. California*, 735 ILCS 5/2-301, and Illinois Supreme Court Rule 13.
- 3. Docket CORRECTED.** The Clerk is DIRECTED to update the docket in Case No. 23 CF 1146 to reflect that Defendant proceeds pro se and that the Public Defender’s Office is no longer counsel of record.
- 4. Clerk’s Filing Policy VOID AS APPLIED.** Any administrative policy, directive, or practice conditioning the acceptance of a pro se filing on the presence of an attorney’s signature block is hereby declared void as applied to self-represented defendants in this matter.

DATE:

HON. CHRISTOPHER R. STRIDE

Circuit Court Judge, Courtroom T-611

19th Judicial Circuit, Lake County, Illinois

Proposed by: Bailey C. Russell, ARDC No. 6340962, Lake County Public Defender’s Office | Dated: June 15, 2026