No. 130539

IN THE SUPREME COURT OF ILLINOIS

| PIASA ARMORY, LLC, |) Appeal from the Circuit Court of the) Third Indiaial Circuit, Madison County |
|-------------------------------------|--|
| Plaintiff-Cross-Appellant, |) Third Judicial Circuit, Madison County,) Illinois. |
| v. |) No. 2023-LA-1129 |
| KWAME RAOUL, in his official |)) Date of Notice of Appeal: |
| capacity as Attorney General of the |) The Honorable |
| State of Illinois, |) RONALD J. FOSTER, JR., |
| |) Judge Presiding |
| Defendant-Cross-Appellee, |) |
| •• |) Date of Judgment: March 4, 2024 |
| |) Supreme Court Rule: Rules 302(a) 304(a). |
| | |

MOTION TO LEAVE TO FILE DOCKETING STATEMENT INSTANTER

Comes now Plaintiff-Cross-Appellant Piasa Armory, LLC, and moves for leave

to file its docketing statement instanter.

1. That Plaintiff previously tendered its docketing statement on 4-2-2024, but same

was rejected as same was due on 4-1-2023.

- 2. That Plaintiff apologizes for the oversight, and wishes to file its docketing statement.
- 3. That no prejudice to any party will result from same being filed on this date.
- 4. A copy of the proposed docketing statement is attached hereto.

WHEREFORE, Plaintiff Humbly requests this Honorable Court grant it leave to file its

docketing statement instanter.

E-FILED 4/3/2024 2:29 PM CYNTHIA A. GRANT SUPREME COURT CLERK

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

4-3-2024

Respectfully Submitted, Piasa Armory, LLC

s/Thomas G. Maag

Thomas G. Maag #6272640 Maag Law Firm, LLC 22 West Lorena Avenue Wood River, Illinois 62095 Telephone: (618) 216-5291 E-mail address: tmaag@maaglaw.com

CERTIFICATE OF FILING AND SERVICE

I certify that on April 3, 2024, I electronically filed the foregoing Motion for Leave to file Docketing Statement *Instanter* with the Supreme Court of Illinois by using the Odyssey eFileIL system.

I further certify that counsel for the other participants in this matter, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served by the Odyssey eFileIL system.

Counsel for Defendant-Cross-Appellee Alex Hemmer Deputy Solicitor General CivilAppeals@ilag.gov (primary) Alex.Hemmer@ilag.gov (secondary)

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

| | s/ <u>Thomas G. Maag</u> | |
|-----------------|----------------------------|--|
| | Thomas G. Maag | |
| | Maag Law Firm, LLC | |
| Address: | 22 West Lorena Avenue | |
| | Wood River, Illinois 62095 | |
| Telephone: | (618) 216-5291 | |
| E-mail address: | tmaag@maaglaw.com | |

No. 130539

IN THE SUPREME COURT OF ILLINOIS

| PIASA ARMORY, LLC, |) Appeal from the Circuit Court of the |
|---|--|
| Plaintiff-Cross-Appellant, |) Third Judicial Circuit, Madison County,) Illinois. |
| v. |)) No. 2023-LA-1129 |
| KWAME RAOUL, in his official capacity as Attorney General of the State of Illinois, |)) Date of Notice of Appeal:) The Honorable) RONALD J. FOSTER, JR.,) Judge Presiding |
| Defendant-Cross-Appellee, |)) Date of Judgment: March 4, 2024) Supreme Court Rule: Rules 302(a) and 304(a). |

DOCKETING STATEMENT (Civil)

1. Is this a cross-appeal, separate appeal, joining in a prior appeal, or related to another appeal which is currently pending or which has been disposed of by this court? This is a cross-appeal. Defendant has filed an appeal, which has been docketed under the same docket number.

If so, state the docket number(s) of the other appeal(s): 130539

2. If any party is a corporation or association, identify any affiliate, subsidiary, or parent group: N/A

3. Full name and complete address of Cross appellant(s) filing this statement: Full name and complete address of Cross-appellant filing this statement:

| Name: | Piasa Armory, LLC | |
|-----------------|-----------------------|--|
| Address: | 3685 E. Broadway | |
| | Alton, Illinois 62002 | |
| Telephone: | (618) 433-2715 | |
| E-mail address: | sales@piasaarmory.com | |

Counsel on Appeal for Cross-appellant filing this statement:

| Name: | Thomas G. Maag | |
|-----------------|----------------------------|--|
| | Maag Law Firm, LLC | |
| Address: | 22 West Lorena Avenue | |
| | Wood River, Illinois 62095 | |
| Telephone: | (618) 216-5291 | |
| E-mail address: | tmaag@maaglaw.com | |

4. Full name and complete address of Cross appellee:

Full name and complete address of Cross-appellee:

| Name: | Kwame Raoul, Attorney General of Illinois |
|-----------------|---|
| Address: | 115 LaSalle St. |
| | Chicago, Illinois 60603 |
| Telephone: | (312) 814-5526 |
| E-mail address: | N/A |

Counsel on Appeal for Cross-appellee:

| Alex Hemmer | |
|----------------------------------|--|
| Deputy Solicitor General | |
| 115 S. LaSalle St. Chicago, | |
| Illinois 60603 | |
| (312) 814-5526 | |
| CivilAppeals@ilag.gov (primary) | |
| Alex.Hemmer@ilag.gov (secondary) | |
| | |

5. Court reporting personnel:

| Name: | Jennifer L. Herbeck |
|-----------------|-------------------------------|
| Address: | Madison County Courthouse |
| | 155 N. Main Street |
| | Edwardsville, Illinois 62025 |
| Telephone: | (618) 296-4901 |
| E-mail address: | jlherbeck@madisoncountyil.gov |

6. Is this appeal from a final order in a matter involving child custody or allocation of parental responsibility or relocation of unemancipated minors pursuant to Illinois Supreme Court Rule 311(a), which requires Mandatory

Accelerated Disposition of Child Custody, Allocation of Parental Responsibilities, and Relocation of Unemancipated Minors Appeals?

Yes:

*If yes, this docketing statement, briefs and all other notices, motions and pleadings filed by any party shall include the following statement in bold type on the top of the front page:

THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER RULE 311(a)

7. State the general issues proposed to be raised (failure to include an issue in this statement will not result in the waiver of the issue on appeal):

Whether the circuit court erred in finding that the three readings rule of the Illinois Constitution 2-101.5 of the Code of Civil Procedure facially unconstitutional

As \underline{X} attorney for appellants______self-represented appellant (check one), I hereby certify that on April 2, 2024, I requested the clerk of the circuit court to prepare the record on appeal.

On April 2, 2024, my office made a written request to the court reporting personnel to prepare the transcripts, a copy of which is attached to this Docketing Statement.

<u>April 3. 2024</u> Date Is/ Thomas G. Maag Appellants' Attorney

IN THE CIRCUIT CURT THIRD JUDICIAL CIRCUIT MADISON COUNTY, ILLINOIS

PIASA ARMORY, LLC,

Plaintiff,

v.

No. 2023 LA 1129

KWAME RAOUL, in his official capacity as Attorney General of the State of Illinois,

Defendant.

RECORD REQUEST

On behalf of Plaintiff Piasa Armory, LLC, by and through its attorneys, Thomas G, Maag

and the Maag Law Firm, LLC, to the extent that it has not already been requested to be prepared

by the State (and I believe it has), please consider this a request to prepare the record on appeal.

This would include any transcripts of any hearings held in this case to date.

Dated: 4-2-2024

Respectfully Submitted, Piasa Armory, LLC

By/<u>sThomas G. Maag</u> Thomas G. Maag #6272640 Maag Law Firm, LLC 22 West Lorena Avenue Wood River, IL 62095 618-216-5291 tmaag@maaglaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed using electronic means, which will send notifications to the following:

Darren Kinkead Darren.kinkead@ilag.gov

Date: 4-2-2024

s/Thomas G. Maag

CERTIFICATE OF FILING AND SERVICE

I certify that on April 3, 2024, I electronically filed the foregoing Docketing Statement with the Supreme Court of Illinois by using the Odyssey eFileIL system.

I further certify that counsel for the other participants in this matter, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served by the Odyssey eFileIL system.

Counsel for Defendant-Cross-Appellee Alex Hemmer Deputy Solicitor General CivilAppeals@ilag.gov (primary) Alex.Hemmer@ilag.gov (secondary)

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

| s/ <u>Thomas</u> | G. Maag |
|------------------|---------|
| Thomas G. | |

Maag Law Firm, LLC

22 West Lorena Avenue

Address:

Wood River, Illinois 62095Telephone:(618) 216-5291E-mail address:tmaag@maaglaw.com