

**THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION
UNDER RULE 604(h)**

E-FILED
12/5/2024 9:00 AM
CYNTHIA A. GRANT
SUPREME COURT CLERK

IN THE

SUPREME COURT OF ILLINOIS

SEAN GRAYSON,

)

)

)

Original Motion for Supervisory Order
Pursuant to Supreme Court Rule 383.

Movant,

)

-vs-

)

)

JUSTICES OF THE ILLINOIS
APPELLATE COURT, FOURTH
DISTRICT

)

Trial Court No. 24 CF 909
Appeal No. 4-24-1100

)

)

)

Respondents.

**EMERGENCY MOTION FOR SUPERVISORY ORDER
IN RULE 604(h) APPEAL**

Movant, Sean Grayson, by Carolyn Klarquist, Director of Pretrial Fairness Appeals, and Deborah K. Pugh, Assistant Appellate Defender, Office of the State Appellate Defender, respectfully files this emergency motion for supervisory order to grant his release from pretrial detention, with conditions to be imposed by the circuit court, during the pendency of the State’s petition for leave to appeal and subsequent appellate proceedings, should the petition for leave to appeal be granted.

In support of this motion, counsel states:

1. On July 18, 2024, the circuit court ordered Sean Grayson detained pending disposition of his criminal case pursuant to the Pretrial Fairness Act. (C. 25) *See* Pub. Act 101-652, § 10-255, 102-1104, § 70. On August 19, 2024, the circuit court denied Grayson’s motion for relief, and Grayson file a timely notice of appeal. (C. 123, 125) The Office of the State Appellate Defender was appointed to represent Grayson on September 3, 2024.

2. On November 27, 2024, the appellate court ruled that the State had failed to meet its burden regarding conditions and remanded the case for a hearing on conditions of release. *People v. Grayson*, 2024 IL App (4th) 241100-U, ¶¶ 59, 62.

3. On December 2, 2024, the State filed a motion to stay the mandate, arguing that because this is a “high-profile case,” Grayson’s release from pretrial detention, as ordered by the appellate court, could lead to “a high likelihood of societal upheaval” and “leave the citizens of Illinois with diminished confidence in the criminal justice system.” (*See Supporting Record*)

4. Also on December 2, 2024, Grayson filed an objection to the State’s motion to stay the mandate, arguing that the State had not provided a compelling reason to stay the mandate. (*See Supporting Record*) Under Supreme Court Rule 604(a)(3), a “defendant shall not be held in jail . . . during the pendency of an appeal by the State, or of a petition or appeal by the State under Rule 315(a), unless there are compelling reasons for his or her continued detention[.]” Ill. Sup. Ct. R. 604(a)(3). “Compelling reasons are forceful and impelling reasons irresistible in sense and purpose” over which “reasonable minds would not diverge.” *People v. Wells*, 279 Ill. App. 3d 564, 569 (5th Dist. 1996). Under this rule, continued detention should be “rare.” *Id.* “The rule favors release.” *People v. Baltimore*, 381 Ill. App. 3d 115, 125 (2d Dist. 2008).

5. These principles, which apply generally to State appeals, apply with special force to appeals under the pretrial release statute which presumes that a “defendant is entitled to release” on conditions. 725 ILCS 5/110-2(a) (West 2024). Routine stays of mandate in detention cases could result in appellate court orders for release being ignored until they become moot due to the resolution of the case below.

6. On December 3, 2024, the appellate court entered an order finding that “the

State has failed to show compelling reasons for defendant’s continued detention during the pendency of the petition,” yet, it stayed the issuance of the mandate for 35 days in order “to allow the State to pursue a further of the mandate directly from this Court.” (*See Supporting Record*)

7. On December 4, 2024, the State filed a petition for leave to appeal in this Court.

8. Given the appellate court’s conclusive determination that the State failed to show compelling reasons for Grayson’s continued detention, he asks this Court to issue a supervisory order directing the appellate court to remand the matter to the circuit court with directions that it promptly “set the case for a hearing to determine the least restrictive conditions of defendant’s pretrial release pursuant to section 110-5 of the Code (725 ILCS 5/110-5) (West 2022)).” *Grayson*, 2024 IL App (4th) 241100-U, ¶ 68.

WHEREFORE, Movant respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/Deborah K. Pugh
DEBORAH K. PUGH
Assistant Appellate Defender
Office of the State Appellate Defender
First Judicial District
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
1stdistrict.eserve@osad.state.il.us

COUNSEL FOR MOVANT

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

Under the penalties provided in law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this motion are true and accurate.

/s/ Deborah K. Pugh
DEBORAH K. PUGH
Assistant Appellate Defender

IN THE
SUPREME COURT OF ILLINOIS

SEAN GRAYSON,)	
)	
Movant,)	Original Motion for Supervisory Order
)	Pursuant to Supreme Court Rule 383.
-vs-)	
)	
JUSTICES OF THE ILLINOIS)	Trial Court No. 24 CF 909
APPELLATE COURT, DISTRICT)	Appeal No. 4-24-1100
)	
Respondents.)	

SUPPORTING RECORD

People v. Grayson, 4-24-1100, Appellate Court Order, Dec. 3, 2024 1

People v. Grayson, 4-24-1100, State’s Motion to Stay the Mandate, Dec. 2, 2024 2

People v. Grayson, 4-24-1100, Grayson’s Objections to State’s Motion to Stay the Mandate,
Dec. 2, 2024 7



STATE OF ILLINOIS
APPELLATE COURT
 FOURTH DISTRICT
 201 W. MONROE STREET
 SPRINGFIELD, IL 62704
 217-782-2586

FILED
 December 03, 2024
 APPELLATE
 COURT CLERK

4-24-1100

THE PEOPLE OF THE STATE OF
 ILLINOIS,
 Plaintiff-Appellee,
 v.
 SEAN GRAYSON,
 Defendant-Appellant.

Sangamon County
 Case No.: 24CF909

ORDER

The appellate court’s mandate in most appeals is to be issued no earlier than 35 days after the entry of judgment. See Ill. S. Ct. R. 368(a), made applicable to criminal cases by Ill. S. Ct. R. 612(b)(15). A shorter period of only five days is provided for in appeals from pretrial detention orders. See Ill. S. Ct. R. 613(d). The five-day time frame was intended to accelerate the issuance of the mandate in pretrial detention appeals while still giving any party “time to request that [the mandate] be stayed.” Report and Recommendations of the Illinois Supreme Court’s Pretrial Release Appeals Task Force, page 13. The State may petition for a stay of the mandate “until final disposition of the case by the Supreme Court” pursuant to Supreme Court Rule 368(c).

Supreme Court Rule 604(a)(3) provides that a “defendant shall not be held in jail or to bail during the pendency of an appeal by the State, or of a petition or appeal by the State under Rule 315(a), unless there are compelling reasons for his or her continued detention or being held to

bail.” Ill. S. Ct. R. 604(a)(3). Here, the State has failed to show compelling reasons for defendant’s continued detention during the pendency of the petition. Consequently, the State’s request to stay issuance of the mandate pending disposition of proceedings before the Supreme Court is denied.

We will, however, stay issuance of the mandate for 35 days. This will allow the State to pursue a further stay of the mandate directly from the Supreme Court. See Ill. S. Ct. 368(c). Absent a further stay from the Supreme Court, the mandate will issue 35 days from the judgment (*i.e.*, on January 2, 2025). In light of the “compelling reasons” requirement of Supreme Court Rule 604(a)(3), we order that the mandate will not be automatically stayed beyond that date as otherwise provided by Supreme Court Rule 368(b). See Ill. S. Ct. R. 368(b), 604(a)(3).

It is therefore ORDERED: the State’s motion to stay the mandate is granted in part and denied in part, and issuance of the mandate is stayed until January 2, 2025.

Order entered by the court.

No. 4-24-1100IN THE
APPELLATE COURT OF ILLINOIS
FOR THE FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the Circuit Court
)	of the Seventh Judicial Circuit
Plaintiff-Appellee,)	Sangamon County, Illinois
)	
v.)	Case No. 2024-CF-909
)	
SEAN P. GRAYSON,)	The Honorable
)	RYAN CADAGIN,
Defendant-Appellant.)	Judge Presiding.

MOTION TO STAY MANDATE

Now come the PEOPLE OF THE STATE OF ILLINOIS by David J. Robinson, Chief Deputy Director, State's Attorney Appellate Prosecutor, and respectfully moves this Court to stay the mandate in the above-entitled cause. In support of this motion counsel states:

1. On November 27, 2024, this Court reversed the trial court's order denying defendant's pretrial release.
2. The State intends to file a supervisory order and a petition for leave to appeal to the Illinois Supreme Court. Accordingly, the State requests that this Court stay the mandate pending the disposition of the supervisory order and petition for leave to appeal.
3. This being a high-profile case, there is a high likelihood of societal upheaval upon defendant's release. This is especially true when there is a significant chance of the Illinois Supreme Court reversing this Court's order in light of *People v. Mikolaitis*, 2024 IL 130693. Allowing defendant's pretrial release pending a petition for leave to appeal, the granting of which would put defendant back in pretrial detention, could leave the citizens of Illinois with diminished confidence in the criminal justice system.

4. In accordance with Supreme Court Rule 610(c) and Fourth District local rules, counsel has conferred with opposing counsel, who, even though they affirmatively decided *not* to file a memorandum in support of defendant, intends to object to this motion.

WHEREFORE, the People of the State of Illinois respectfully requests that this Court stay the mandate in the above-entitled cause pending disposition of the supervisory order and petition for leave to appeal.

Respectfully submitted,

THE PEOPLE OF THE STATE OF ILLINOIS

BY: /s/ David J. Robinson

David J. Robinson

ARDC No. 6293647

State's Attorneys Appellate Prosecutor

drobinson@ilsaap.org

Patrick Delfino

Director

State's Attorneys Appellate

Prosecutor

725 South Second Street

Springfield, Illinois 62704

(217) 782 - 8076

SAFE-T@ilsaap.org

COUNSEL FOR PLAINTIFF-APPELLEE

STATE OF ILLINOIS)
) SS
COUNTY OF SANGAMON)

AFFIDAVIT

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 motion are true and accurate.

/s/ David J. Robinson
David J. Robinson
State's Attorneys Appellate Prosecutor

No. 4-24-1100

IN THE
APPELLATE COURT OF ILLINOIS
FOR THE FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff-Appellee,

v.

SEAN P. GRAYSON,

Defendant-Appellant.

) Appeal from the Circuit Court
) of the Seventh Judicial Circuit
) Sangamon County, Illinois
)
) Case No. 2024-CF-909
)
) The Honorable
) RYAN CADAGIN,
) Judge Presiding.

ORDER

This matter coming to be heard on the State’s motion, all parties having been duly notified, and the Court being advised in the premises, IT IS HEREBY ORDERED: That the State’s Motion to Stay Mandate is hereby allowed / denied.

DATED: _____

ENTER: _____
JUSTICE

ENTER: _____
JUSTICE

ENTER: _____
JUSTICE

No. 4-24-1100

IN THE
APPELLATE COURT OF ILLINOIS
FOR THE FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the Circuit Court
)	of the Seventh Judicial Circuit
Plaintiff-Appellee,)	Sangamon County, Illinois
)	
v.)	Case No. 2024-CF-909
)	
SEAN P. GRAYSON,)	The Honorable
)	RYAN CADAGIN,
Defendant-Appellant.)	Judge Presiding.

NOTICE AND PROOF OF SERVICE

TO: Carolyn R. Klarquist, Director
Office of the State Appellate Defender
203 N. LaSalle Street, 24th Floor
Chicago, Illinois 60601
PFA@osad.state.il.us

Under the penalties provided in law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the State’s Petition for Rehearing is being electronically filed on November 28, 2024, and one copy of same is being served upon defendant’s attorney of record via electronic mail on this date.

/s/ Luke McNeill
Luke McNeill, PFA Legal Counsel
State's Attorneys Appellate Prosecutor
SAFE-T@ilsaap.org

No. 4-24-1100

IN THE
APPELLATE COURT OF ILLINOIS
FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the Circuit Court of
)	the Seventh Judicial Circuit,
Plaintiff-Appellee,)	Sangamon County, Illinois
)	
)	No. 24 CF 909
-vs-)	
)	
SEAN GRAYSON,)	Honorable
)	Ryan Cadagin,
Defendant-Appellant.)	Judge Presiding.

**OBJECTION TO STATE’S MOTION TO STAY MANDATE
NOTICE OF MOTION AND PROOF OF SERVICE**

CAROLYN R. KLARQUIST
Director of Pretrial Fairness Unit

DEBORAH K. PUGH
ARDC No. 6287137
Assistant Appellate Defender
Office of the State Appellate Defender
Pretrial Fairness Unit
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
PFA.eserve@osad.state.il.us

COUNSEL FOR DEFENDANT-APPELLANT

No. 4-24-1100

IN THE

APPELLATE COURT OF ILLINOIS

FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the Circuit Court of
)	the Seventh Judicial Circuit,
Plaintiff-Appellee,)	Sangamon County, Illinois
)	
-vs-)	No. 24 CF 909
)	
SEAN GRAYSON,)	Honorable
)	Ryan Cadagin,
Defendant-Appellant.)	Judge Presiding.

OBJECTION TO STATE'S MOTION TO STAY MANDATE

Defendant-Appellant, Sean Grayson, by Carolyn R. Klarquist, Director of Pretrial Fairness Unit, and Deborah K. Pugh, Assistant Appellate Defender, Office of the State Appellate Defender, respectfully requests that this Court deny the State's motion to stay the mandate in the above-entitled cause.

In support of this motion counsel states:

1. On July 18, 2024, the circuit court ordered Sean Grayson detained pending disposition of his criminal case, pursuant to the Pretrial Fairness Act. (C. 25) *See* Pub. Act 101-652, § 10-255, 102-1104, § 70. On August 19, 2024, the circuit court denied Grayson's motion for relief. (C. 123)

2. In his motion for relief, Grayson argued that the State had failed to prove that no conditions could mitigate any danger posed by his release. (C. 45-50) He argued that the State relied almost exclusively on its factual proffer of the underlying offense,

which did not establish that no conditions could mitigate any risk. (C. 46) Grayson further argued that the circuit court erred in finding that any threat “could not be mitigated because he was a sworn officer at the time of the offense,” as he is no longer working in his official capacity. (R. 23-24) Pursuant to Illinois Supreme Court Rule 604(h)(7), appellate counsel relied on the thorough arguments contained in the motion for relief and did not file an optional memorandum.

3. On November 27, 2024, this Court ruled that the State had failed to meet its burden regarding conditions and remanded the case for a hearing on conditions of release. *People v. Grayson*, 2024 IL App (4th) 241100-U, ¶¶ 59, 62.

4. On December 2, 2024, the State filed a motion to stay the mandate in this case, indicating its plan to file a petition for leave to appeal and a motion for a supervisory order in the Illinois Supreme Court.

5. The State’s motion should be denied because it does not provide a compelling reason to recall the mandate. Under Supreme Court Rule 604(a)(3), “[a] defendant shall not be held in jail . . . during the pendency of an appeal by the State, or of a petition or appeal by the State under Rule 315(a), unless there are compelling reasons for his or her continued detention.” Ill. Sup. Ct. R. 604(a)(3) (eff. Apr. 16, 2024). “Compelling reasons are forceful and impelling reasons irresistible in sense and purpose” over which “reasonable minds would not diverge.” *People v. Wells*, 279 Ill. App. 3d 564, 569 (5th Dist. 1996). Under this rule, continued detention should be “rare.” *Id.* “The rule favors release.” *People v. Baltimore*, 381 Ill. App. 3d 115, 125 (2d Dist. 2008).

5. These principles, which apply generally to State appeals, apply with

special force to appeals under the pretrial release statute. Under the statute, “[i]t is presumed that a defendant is entitled to release” on conditions. 725 ILCS 5/110-2(a) (West 2022). Routine stays of mandate in detention cases could result in this Court’s orders for release being ignored until they become moot due to the resolution of the case below.

6. The State insists that because this case is “high-profile,” Grayson is not entitled to the same rights and protections offered to other criminal defendants in the State of Illinois. (St. Mtn for Stay, ¶ 3) The State, of course, offers no support for this claim, as none exists. All defendants, high profile or not, are to be treated equally under the law. Additionally, surely this Court was well aware of the “high-profile” nature of the case when it issued the decision.

7. The State also claims that this Court should issue a stay of its decision because “there is a high likelihood of societal upheaval upon defendant’s release.” (St. Mtn to Stay, ¶ 3) Yet it offers no evidence to support its claim that “societal upheaval” would occur; in fact, this Court’s decision was issued nearly a week ago, and the State points to no resulting “upheaval.” Moreover, courts rule based on the law, not on public opinion. Indeed many of the most significant decisions in our country’s history have been “high profile” and have even led to “societal upheaval.” *See, e.g., Brown v. Board of Education*, 347 U.S. 483 (1954). The State offers no support for its insinuation that public opinion, not statutes, rules, and case law, should govern this Court’s actions.

8. The State also proclaims, without argument or explanation, that there is a “significant chance” that this Court’s decision will be overturned in light of *People v. Mikolaitis*, 2025 IL 130693. (St. Mtn for Stay, ¶ 3) The State’s suggestion that this

Court is unaware of *Mikolaitis*, which was issued prior to the decision in this case, is puzzling and unfounded. More importantly, the State offers no discussion of *Mikolaitis* to support its baseless claim that this Court's decision cannot stand.

9. Finally, the State contradicts Illinois Supreme Court Rule 604(h)(7) by implying that a conflict exists between appellate counsel's decision to object to the requested stay "even though they affirmatively decided *not* to file a memorandum in support of defendant." (St. Mtn. for Stay, ¶ 4) The rule governing appeals from detention decisions states that the "motion for relief will serve as the argument of the appellant on appeal," that "[i]ssues raised in the motion for relief are before the appellate court regardless of whether the optional memorandum is filed," and that the optional memorandum, if filed, serves a "supplement" to the motion for relief. Ill. Sup. Ct. R. 604(h)(7). The State's suggestion that appellate counsel engages in some kind of contradiction by objecting to the stay subverts the clear language and intent of the rule. A decision to forego the optional motion in no way functions as a concession to the correctness of the circuit court's ruling or as a withdrawal from representation of the defendant-appellant.

10. In sum, the State offers no compelling reason to stay the issuance of the Court's mandate. Given Rule 604's strong preference for release, the State's mere intent to file a motion for a supervisory and PLA in this case falls far short of a compelling reason. The State's motion to stay the mandate should therefore be denied.

WHEREFORE, defendant-appellant respectfully requests that this Court deny the State's motion to stay the mandate.

Respectfully submitted,

/s/ Deborah K. Pugh
DEBORAH K. PUGH
ARDC No. 6287137
Assistant Appellate Defender

COUNSEL FOR DEFENDANT-APPELLANT

No. 4-24-1100

IN THE
APPELLATE COURT OF ILLINOIS
FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the Circuit Court of
)	the Seventh Judicial Circuit,
Plaintiff-Appellee,)	Sangamon County, Illinois
)	No. 24 CF 909
-vs-)	
)	
SEAN GRAYSON,)	Honorable
)	Ryan Cadagin,
Defendant-Appellant.)	Judge Presiding.

NOTICE AND PROOF OF SERVICE

TO: Mr. David J. Robinson, Chief Deputy Director - PTFA, State's Attorneys
Appellate Prosecutor, Springfield, IL 62704, Safe-T@ilsaap.org

Mr. Sean Grayson, Menard County Jail, 315 South Sixth Street,
Petersburg, IL 62675

Under penalties as provided in law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the Objection to State's Motion to Stay Mandate was filed with the Clerk of the Appellate Court using the court's electronic filing system in the above-entitled cause on December 2, 2024. Upon acceptance of the filing from this Court, persons named above with identified email addresses will be served using the court's electronic filing system and one copy is being mailed to the appellant in an envelope deposited in a U.S. mail box in Chicago, Illinois, with proper postage prepaid.

/s/ Christopher Moy-Lopez
LEGAL SECRETARY
Office of the State Appellate Defender
Pretrial Fairness Unit
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
PFA.eserve@osad.state.il.us

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

Deborah K. Pugh, being first duly sworn on oath, deposes and says that the documents contained in the Supporting Record are true and accurate copies of the documents contained in the record on appeal or filed in the Appellate Court of Illinois.

Deborah K Pugh

DEBORAH K. PUGH
Assistant Appellate Defender

SUBSCRIBED AND SWORN TO BEFORE ME
on December 4, 2024.

Ann Marie Corona

NOTARY PUBLIC



IN THE
SUPREME COURT OF ILLINOIS

SEAN GRAYSON,)	
)	
Movant,)	Original Motion for Supervisory Order
)	Pursuant to Supreme Court Rule 383.
-vs-)	
)	
JUSTICES OF THE ILLINOIS)	Trial Court No. 24 CF 909
APPELLATE COURT, DISTRICT)	Appeal No. 4-24-1100
)	
Respondents.)	

ORDER

This matter coming to be heard on Movant’s motion, all parties having been duly notified, and the Court being advised in the premises,

IT IS HEREBY ORDERED:

That the Motion for Supervisory Order is hereby allowed/denied.

DATE: _____

JUSTICE

DEBORAH K. PUGH
Assistant Appellate Defender
Office of the State Appellate Defender
First Judicial District
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
1stdistrict.eserve@osad.state.il.us

COUNSEL FOR MOVANT

IN THE
SUPREME COURT OF ILLINOIS

SEAN GRAYSON,)	
)	
Movant,)	Original Motion for Supervisory Order
)	Pursuant to Supreme Court Rule 383.
-vs-)	
)	
JUSTICES OF THE ILLINOIS)	Trial Court No. 24 CF 909
APPELLATE COURT, DISTRICT)	Appeal No. 4-24-1100
)	
Respondents.)	

NOTICE AND PROOF OF SERVICE

Carla Bender, Clerk of the Appellate Court, Fourth Judicial District, 201 West Monroe Street Springfield, IL 62794, AC_District4_Clerk@illinoiscourts.gov;

Mr. Kwame Raoul, Attorney General, 115 S. LaSalle St., Chicago, IL 60603, eserve.criminalappeals@ilag.gov;

Mr. David J. Robinson, Chief Deputy Director - PTFA, State's Attorneys Appellate Prosecutor, 725 South Second Street, Springfield, IL 62704; Safe-T@ilsaap.org;

Mr. Sean Grayson, Menard County Jail, 315 South Sixth Street, Petersburg, IL 62675.

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. On December 5, 2024, the Motion for Supervisory Order was filed with the Clerk of the Supreme Court of Illinois using the court's electronic filing system in the above-entitled cause. Upon acceptance of the filing from this Court, persons named above with identified email addresses will be served using the court's electronic filing system. The Clerk of the Appellate Court, Fourth District will deliver one copy to each of the above-named Justices of the Appellate Court, Fourth District. One copy is being mailed to the Movant in an envelope deposited in a U.S. mail box in Chicago, Illinois, with proper postage prepaid.

/s/Christopher Moy-Lopez
LEGAL SECRETARY
Office of the State Appellate Defender
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
Service via email is accepted at
1stdistrict.eserve@osad.state.il.us
COUNSEL FOR MOVANT