

**UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT**

RAYMOND E BUTLER, II,

Appellant,

7<sup>th</sup> Cir. Case No. 25-2589

District Court Case No. 1:25-cv-04443

Hon. Georgia N. Alexakis

v

ELI JACKFINN EDDI a/k/a ELY EDDI, ILANA FINN EDDI, DORINE  
MAGENCE, MANUEL MAGENCE, JEFFREY K. GUTMAN,  
NACHSHON DRAIMAN, WILLIAM KANTER, JOEL S. ROTHMAN,  
MOSHE SOLOVEICHNIK, ALAN GREEN, JERRY CHERNEY, SHMUEL  
FUERST, HAROLD KATZ, SAMUEL MASLATON, DANIEL BERGMAN,  
IRVING BIRNBAUM, ARON STANTON, CHAIM RAJCHENBACH, RIVKA  
RAJCHENBACH, AVRUM RAJCHENBACH, MENACHEM SHABAT, AHUVA  
SHABAT, RONALD SHABAT, ERIC ROTHNER, COLMAN GINSPARG,  
JAMES MAINZER, MARSHALL K. BROWN, JEFFREY FINN, MEIR “AARON”  
COHEN, GARRY CHANKIN, NANCY ROSEN, MARK ANTEBI, BARRY  
ANTEBI, DAVID R. RAANAN, and ELLIOT E. ANTEBEI.

Appellees.

**MOTION FOR EN BANC REVIEW**

Oral Argument Requested

Pursuant to Federal Rule of Appellate Procedure 40, Seventh Circuit Rule 35, Raymond E. Butler, the Appellant, petitions this Court for rehearing en banc of Judge Maldonado's decision issued on October 3, 2025, denying Appellants' Motion to Disqualify Judge Nancy L. Maldonado. En banc review is warranted under Federal Rule of Appellate Procedure 40 because the decision involves questions of exceptional importance regarding judicial impartiality, due process, procedural compliance, and to maintain uniformity in this Circuit's decisions. Appellant requests oral argument and expedited review due to ongoing irreparable harm, with a ruling requested by November 21, 2025. *Fed. R. App. P. 40(a)*.

## **I. Statement of Grounds**

Federal Rule of Appellate Procedure 40 authorizes en banc rehearing when necessary to (1) secure or maintain uniformity of the Court's decisions or (2) address a question of exceptional importance. Both apply here. The denial order—listing Judge Maldonado's name presiding over the motion but missing a signature—raises exceptional concerns about self-adjudication of conflicts, abuse of discretion, and procedural defects in unsigned orders, implicating constitutional due process under the Fifth Amendment and public trust in the judiciary. *Fed. R. App. P. 40(a)*.

Uniformity is threatened by inconsistency with Circuit precedent requiring recusal in cases of apparent bias. *In re Golant*, 239 F.3d 931 (7th Cir. 2001). These issues affect systemic judicial integrity, warranting full Court review.

## **II. Background**

On September 24, 2025, Appellant's counsel, Katherine A. London, filed a Motion to Disqualify Judge Maldonado from this appeal under 28 U.S.C. §§ 144 and 455, citing her status

as a named defendant in a related RICO action (*Butler v. Alexakis, et al.*, No. 1:25-cv-10904 (N.D. Ill.)), where she is accused of racketeering, obstruction of justice (18 U.S.C. § 1503), wire fraud (18 U.S.C. § 1343), and constitutional violations based on her handling of an emergency ex parte appeal in the underlying district case (No. 1:25-cv-04443) (Exhibit A). The motion included a Certificate of Good Faith under 28 U.S.C. § 144 (certifying allegations as true, made in good faith, and not for delay) and Appellant's affidavit averring personal knowledge of bias from extrajudicial sources, including a "pattern of disparate treatment" favoring Appellees. All allegations were supported by exhibits from court filings and public records, directly tied to disqualification grounds.

On October 3, 2025, Judge Maldonado alone denied the motion, ruling on her own disqualification without referral to another judge or panel (Exhibit B). This self-adjudication created a per se appearance of partiality. Subsequently, on October 10, 2025, the Court issued an unsigned show cause order (lacking any judge's name, signature, or initials) regarding potential sanctions against Attorney London under Federal Rule of Appellate Procedure 46(c) for alleged misconduct by filing the disqualification motion (Exhibit C). *Fed. R. App. P. 46(c)*. Attorney London responded on October 20, 2025, addressing the allegations and requesting a hearing if necessary to present testimony, including from Appellant (Exhibit D). No hearing was scheduled or held. On November 7, 2025, the Court issued an unsigned sanctions order (again lacking any judge's name, signature, or initials), imposing a fine under FRAP 46(c) for "unwillingness to take responsibility," "disrespect," and "knowingly misrepresented facts" without specifying the facts or providing evidence (Exhibit E).

### III. ARGUMENT

#### **A. Judge Maldonado's Self-Denial of the Disqualification Motion Violates Recusal Statutes and Constitutes Abuse of Discretion**

Under 28 U.S.C. § 455(a), a judge "shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned," an objective standard to protect public confidence (*Liteky v. United States*, 510 U.S. 540, 548 (1994)). Section 455(b)(1) requires recusal for "personal bias or prejudice concerning a party." 28 U.S.C. § 455(b)(1). Under 28 U.S.C. § 144, disqualification is mandated upon a timely affidavit alleging bias from extrajudicial sources. These statutes apply because Judge Maldonado's role as a defendant in a RICO suit, case no. 1:25-cv-10904, is predicated on acts Judge Maldonado and District Judge Alexakis undertook while overseeing Emergency Ex Parte Appeal No. 25-2315 as part of this underlying case (No. 1:25-cv-04443). Judge Maldonado's designation as a party in case No. 1:25-cv-10904, creates an adversarial position between her and Plaintiff-Appellant, mandating recusal (*Preston v. United States*, 923 F.2d 731, 734 (9th Cir. 1991) (recusal required when judge sued by party)).

Such a lawsuit against a presiding judge inherently raises an appearance of partiality, as recognized in precedent like *Preston v. United States*, 923 F.2d 731, 734 (9th Cir. 1991) (recusal mandatory when a judge is sued by a party, placing her in an adversarial role). Under 28 U.S.C. § 455(a), a judge "shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned." 28 U.S.C. § 455(a). This objective standard protects the public's confidence in the judiciary (*Liteky v. United States*, 510 U.S. 540, 548 (1994)). Section 455(b)(1) mandates recusal where the judge "has a personal bias or prejudice concerning a party." 28 U.S.C. § 455(b)(1).

Judge Maldonado's solo denial exemplifies abuse of discretion, as it ignores evidence of bias and applies subjective standards without citation to law, conflicting with *Preston v. United States*, 923 F.2d 731 (9th Cir. 1991) (holding that recusal is mandatory when a judge is sued by a party, as it creates an "adversarial position" and appearance of partiality). This self-adjudication risks strategic misuse of process and departs from objective law. Due process requires recusal when there's a "serious risk of actual bias" (objective standard), to avoid subjective or strategic decisions. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) See also *Williams v. Pennsylvania*, 579 U.S. 1 (2016) (a judge's prior involvement creates unconstitutional bias risk, emphasizing objective standards to prevent misuse). En banc review is essential under Federal Rule of Appellate Procedure 35(a)(2) to address this exceptional threat to impartiality and uniformity with Circuit cases like *Vega v. Chicago Bd. of Educ.*, No. 23-1183 (7th Cir. July 29, 2024) (requiring procedural safeguards in discipline). *Fed. R. App. P. 35(a)(2)*.

The Motion to Disqualify Judge Maldonado was a properly supported pleading that advanced credible, fact-based allegations derived from extrajudicial sources, as required by 28 U.S.C. §§144 and 455, as well as related authorities. It eschews scurrilous or unfounded claims by relying on documented evidence—court filings, exhibits, public records, and sworn certifications—presented in a professional manner to preserve judicial integrity and Plaintiff's due process rights. Any characterization otherwise misconstrues the Motion's evidentiary foundation and legal purpose.

## **B. Unsigned Orders Violate Procedural Rules and Due Process**

The show cause and sanctions orders lack any judge's or clerk's name, signature, or initials, rendering them defective. Federal Rule of Civil Procedure 11(a) requires signatures on

pleadings and orders for authentication, as a substantive mandate (*Becker v. Montgomery*, 532 U.S. 757 (2001) (absence renders document invalid)). Similarly, *George A. Ohl & Co. v. A. L. Smith Iron Works*, 288 U.S. 170 (1933), holds that missing signatures impair parties' rights. The Seventh Circuit Rule 30(a) mandates complete records for review (*United States v. McGhee*, 98 F.4th 816 (7th Cir. 2024) (unsigned orders hinder appellate review)). FRAP 36(a) requires the clerk to prepare, sign, and enter judgments, with notice under FRAP 36(b); unsigned entries violate this, tying to Federal Rule of Civil Procedure 58 (judgments must be properly documented for enforceability). *Fed. R. App. P. 36(a)*, *Fed. R. App. P. 36(b)*, *Fed. R. Civ. P. 58*.

### **C. The Motion to Disqualify Is Protected and Fact-Based**

The disqualification motion is privileged as litigation-related statements essential to the impartiality inquiry (*In re Sch. Asbestos Litig.*, 977 F.2d 764, 776 (3d Cir. 1992)). It relies on sworn affidavits and evidence, complying with §§ 144 and 455, and poses no basis for sanctions absent bad faith (*Liteky*, 510 U.S. at 555). Penalizing it chills judicial accountability. *28 U.S.C. §§144 and 455*.

Further, every allegation in the Motion to Disqualify Judge Nancy L. Maldonado is directly tied to the disqualification grounds under 28 U.S.C. §§455(a) and (b)(1). The statements were made in a formal motion, supported by exhibits, and pertain exclusively to the impartiality inquiry at issue in the underlying appeal. They are not extraneous or gratuitous but essential to demonstrating extrajudicial bias from sources included as exhibits in the RICO suit itself. As such, they fall squarely within the privilege's scope, barring any civil liability or derivative sanctions. *28 U.S.C. §§455(a) and (b)(1)*. See *In re Sch. Asbestos Litig.*, 977 F.2d 764, 776 (3d Cir. 1992) (applying similar principles to protect litigation-related statements from retaliatory claims).

The arguments in Plaintiff-Appellants Motion to Disqualify reflect a client's genuine belief in bias and collusion. The Motion's integrity is further evidenced by the Certificate of Good Faith, executed under penalty of perjury pursuant to 28 U.S.C. §144, wherein counsel certifies that the allegations are believed true, made in good faith, and not for delay or improper purpose. This certification underscores the Motion's foundation in genuine belief supported by evidence. *28 U.S.C. §144.*

Similarly, the Affidavit of Plaintiff, Raymond E. Butler II, avers personal knowledge of the facts, specifies extrajudicial sources, and affirms the belief that bias and collusion stems from a "pattern of disparate treatment" favoring defendants. Such sworn statements elevate the Motion above unfounded conjecture, as they comply with §144's mandate for timely, fact-based affidavits. These sworn statements affirmatively demonstrate adherence to ethical and legal norms. *28 U.S.C. §144.*

By failing to properly assess evidence of irreparable harm and the likelihood of success on the merits. Plaintiff-Appellant's motion, supported by affidavits and evidence, demonstrated in the Motion to Disqualify, poses an imminent risk of irreparable harm. The court erroneously concluded that attorney London knowingly misrepresented facts in court filings. This misinterpretation of Rule 46(c) ignores attorney London's adherence to court protocols and the necessity of relief because of the imminent harm to her reputation and standing within the legal community. *Fed. R. App. P. 46(c).*

The panel decision in this case warrants en banc review for the following reasons:

1. **Exceptional Importance:** The legal issue at the heart of this case is of exceptional importance because it implicates constitutional rights, due process, public policy concerns, and systemic risks to judicial impartiality. The Seventh Circuit has recognized that en banc review is appropriate in such circumstances to ensure the proper development of the law. *Cannon v. Armstrong Containers Inc.*, 92 F.4<sup>th</sup> 688.
2. **Need for En Banc Review** The issues of due process violations, lawfare, and judicial activism raise questions of exceptional importance, as they threaten constitutional rights, public trust, and judicial impartiality. En banc review is necessary to ensure uniformity and uphold the rule of law.
3. **Abuse of Discretion:** The appellate court abused its discretion by misapplying legal standards, ignoring evidence, and ruling arbitrarily. In *General Electric Co. v. Joiner*, 522 U.S. 136 (1997), the Supreme Court held that abuse of discretion occurs when a court's ruling is based on plain error. Here, the court's ruling lacks a rational basis in law or fact, as evidenced by the case law cited by the district court.
4. **Strategic Misuse of Government:** Judge Maldonado's ruling on her own disqualification suggests "lawfare", defined as the strategic use of legal processes for personal ends, highlighting the need for judicial oversight to prevent misuse of authority.
5. **Ruling Lacks and Objective Basis:** Judge Maldonado's decision departs from an objective reading of the law, effectively legislating from the bench. In *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 140 S. Ct. 1959 (2020), the Supreme Court cautioned against unchecked judicial discretion that risks violating the rule of law. The court's order issuing sanctions on attorney London creates new legal standards,


undermining constitutional principles of due process and legislative intent of the entire appellate process, warranting en banc scrutiny.

6. **Procedural Compliance:** This motion complies with the procedural requirements of Federal Rule of Appellate Procedure 40, including the statement of grounds and the identification of conflicts or questions of exceptional importance. *Easley v. Reuss*, 532 F.3d 592. *Fed. R. App. P. 40*.

### **Conclusion**

For the foregoing reasons, Raymond E. Butler II respectfully requests that this Court grant en banc review to vacate the October 3, 2025, denial order, disqualify Judge Maldonado, and remand for impartial proceedings. Such review is necessary to resolve the conflict with binding precedent and to address the question of exceptional importance under FRAP 40 and presented by this case.

Respectfully submitted,


/s/   
Katherine A. London  
Counsel for Plaintiff

Dated: November 14, 2025

Katherine A. London  
Atty No.: 6345920  
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Saint Charles, IL. 60174  
630-507-9998  
klondon@kmflaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on 11/15/25 I served a true and correct copy of the foregoing Notice of Appeal on all parties of record in accordance with Rule 25 of the Federal Rules of Appellate Procedure.

/s/   
Katherine A. London  
Counsel for Plaintiff-Appellant

Katherine A. London  
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Saint Charles, IL. 60174  
630-507-9998  
klondon@kmflaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on 11/15/25 I served a true and correct copy of the foregoing Notice of Appeal on all parties of record in accordance with Rule 25 of the Federal Rules of Appellate Procedure.

*/s/ Katherine A. London*  
\_\_\_\_\_  
Katherine A. London  
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# EXHIBIT A

























# EXHIBIT B

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Everett McKinley Dirksen  
United States Courthouse  
Room 2722 - 219 S. Dearborn Street  
Chicago, Illinois 60604



Office of the Clerk  
Phone: (312) 435-5850  
www.ca7.uscourts.gov

ORDER

October 3, 2025

Before  
NANCY L. MALDONADO, *Circuit Judge*

No. 25-2529	<p>RAYMOND E. BUTLER II, Plaintiff - Appellant</p> <p>v.</p> <p>ELI JACKFINN EDDI, et al., Defendants - Appellees</p> <p>and</p> <p>CIBC BANK USA, Appellee</p>
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**Originating Case Information:**

District Court No: 1:25-cv-04443  
Northern District of Illinois, Eastern Division  
District Judge Georgia N. Alexakis

No. 25-2589	<p>RAYMOND E. BUTLER II, Plaintiff - Appellant</p> <p>v.</p> <p>ELI JACKFINN EDDI, et al., Defendants - Appellees</p> <p>and</p> <p>CIBC BANK USA, Appellee</p>
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**Originating Case Information:**

District Court No: 1:25-cv-04443  
Northern District of Illinois, Eastern Division  
Court Reporter Jennifer Costales  
Clerk/Agency Rep Thomas G. Bruton  
District Judge Georgia N. Alexakis

Upon consideration of the **PLAINTIFF-APPELLANT’S MOTION TO DISQUALIFY JUDGE NANCY L. MALDONADO**, filed on September 24, 2025, by counsel for the appellant,

**IT IS ORDERED** that the motion is **DENIED**.

# EXHIBIT C

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Everett McKinley Dirksen  
United States Courthouse  
Room 2722 - 219 S. Dearborn Street  
Chicago, Illinois 60604



Office of the Clerk  
Phone: (312) 435-5850  
www.ca7.uscourts.gov

ORDER

October 10, 2025

By the Court:

No. 25-2529	<p>RAYMOND E. BUTLER II, Plaintiff - Appellant</p> <p>v.</p> <p>ELI JACKFINN EDDI, et al., Defendants - Appellees</p> <p>and</p> <p>CIBC BANK USA, Appellee</p>
No. 25-2589	<p>RAYMOND E. BUTLER II, Plaintiff - Appellant</p> <p>v.</p> <p>ELI JACKFINN EDDI, et al., Defendants - Appellees</p> <p>and</p> <p>CIBC BANK USA, Appellee</p>
<b>Originating Case Information:</b>	
<p>District Court No: 1:25-cv-04443 Northern District of Illinois, Eastern Division District Judge Georgia N. Alexakis</p>	

Upon consideration of the **PLAINTIFF-APPELLANT'S MOTION TO DISQUALIFY JUDGE NANCY L. MALDONADO**, filed on September 24, 2025, by counsel for the appellant,

**IT IS ORDERED** that attorney Katherine A. London is ordered to show cause why she should not be subject to disciplinary action, which may include suspension or disbarment, for conduct unbecoming a member of this court's bar, *see* Fed. R. App. P. 46, in making scurrilous and unfounded allegations against a judge of this court. The response is due by October 20, 2025.

# EXHIBIT D

**UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT**

RAYMOND E. BUTLER, II,

Plaintiff-Appellant,

Case No. 25-cv-04443

App. Case No. 25-2529

App. Case No. 25-2589

v.

ELI JACKFINN EDDI a/k/a ELY EDDI, et al.,

Defendants-Appellees.

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**REPLY IN RESPONSE TO ORDER TO SHOW CAUSE UNDER  
FED. R. APP. P. 46**

Katherine A. London, counsel for Plaintiff-Appellant Raymond E. Butler II, submits this reply in response to the Court's Order to Show Cause dated October 10, 2025, pursuant to Federal Rule of Appellate Procedure 46(c). This response demonstrates good cause why no discipline should be imposed, as the challenged filing—the Motion to Disqualify Judge Nancy L. Maldonado, filed September 24, 2025 does not contain scurrilous or unfounded allegations.

This analysis is grounded in the factual averments, supporting documentation, and legal precedents cited within the Motion itself, as well as the accompanying Declaration of Raymond E. Butler II (the "Affidavit") and Certificate of Good Faith. In so doing, I draw upon established principles of judicial disqualification, emphasizing the Motion's adherence to requirements for credible, fact-based assertions derived from extrajudicial sources, as opposed to mere conjecture or defamatory rhetoric. They do not constitute conduct unbecoming a member of the bar or a violation of court rules.

## I. FACTUAL BACKGROUND

### A. Legal Framework for Assessing Allegations in Disqualification Motions

Under federal law, motions for judicial disqualification must be evaluated against an objective standard that safeguards the integrity of judicial proceedings. Pursuant to 28 U.S.C. §455(a), a judge shall disqualify herself in any proceeding where her impartiality might reasonably be questioned, and under §455(b)(1), disqualification is mandatory where personal bias or prejudice exists against a party. Complementing this, 28 U.S.C. §144 requires that such motions be supported by an affidavit stating facts and reasons for belief in bias or prejudice, certified as made in good faith and not for delay.

The Supreme Court has clarified that allegations in disqualification motions must be "sufficiently definite and particular" to overcome the presumption of judicial impartiality, arising from extrajudicial sources rather than mere disagreement with rulings. *Liteky v. United States*, 510 U.S. 540, 555 (1994) (holding that bias must stem from sources outside the judicial proceeding, such as personal animus or extrajudicial conduct, and not from "opinions formed by the judge on the basis of facts introduced or events occurring in the course of the current proceedings"). See also *United States v. Baskes*, 687 F.2d 165, 170 (7th Cir. 1981) (bias must be personal and extrajudicial, not inferred from judicial acts alone).

Scurrilous allegations are those intended to vilify or degrade without basis, often characterized by inflammatory language unsupported by evidence. In contrast, the Motion here aligns with the ABA Model Code of Judicial Conduct Rule 2.11 and analogous federal principles, which mandate disqualification based on factual, non-conclusory grounds from





they evidence personal animus. *Liteky*, 510 U.S. at 555. The Motion avoids rude, scandalous, or unfounded attacks by framing targeted misconduct supported by evidence, aligning with Seventh Circuit standards requiring "credible" facts from non-judicial sources. *In re Maurice*, 167 B.R. at 125. Further, the Motion cites these facts objectively, without hyperbolic language, and supports them with docket references, thereby rebutting any claim of unfoundedness. See *United States v. Baskes*, 687 F.2d 165, 170 (7th Cir. 1981) (factual allegations from extrajudicial sources overcome presumptions of impartiality). The Motion was prepared after thorough review of provided evidence and legal research into disqualification standards and reflects zealous advocacy on behalf of a client who has suffered grievous harm.

## II. ARGUMENT

### A. The Filings Do Not Constitute Conduct Unbecoming or a Violation of Court Rules

Discipline under FRAP 46(c), requires clear evidence of bad faith, frivolousness, or intent to harass, not merely unsuccessful or aggressive advocacy. See *In re Snyder*, 472 U.S. 634, 645 (1985) (conduct unbecoming involves moral turpitude or dishonesty); *Roadway Express, Inc. v. Piper*, 447 U.S. 752, 766 (1980) (bad faith required for sanctions). Here, the filings were made in good faith and do not warrant discipline.

First, the motion is grounded in factual allegations from Mr. Butler's affidavit and exhibits, not mere conjecture. The arguments in the RICO complaint, 1:25-cv-10904, leading to the Motion to Disqualify Judge Maldonado, are not frivolous, moreover they serve legitimate purposes: protecting Mr. Butler's due process rights and seeking redress for



proceeding in which [the party] participates, if the matter has some relation thereto." The privilege is absolute, meaning it applies regardless of malice or falsity, to foster "unfettered expression" in the adversarial process. *Thomas v. Petrulis*, 465 N.E.2d 932, 934 (Ill. App. Ct. 1984) (adopting Restatement principles).

Here, every allegation in the Motion is directly tied to the disqualification grounds under 28 U.S.C. §§455(a) and (b)(1). These statements were made in a formal appellate motion, supported by exhibits and pertain exclusively to the impartiality inquiry at issue in this appeal. They are not extraneous or gratuitous but essential to demonstrating extrajudicial bias from sources like exhibits in the RICO suit itself. As such, they fall squarely within the privilege's scope, barring any civil liability or derivative sanctions. See *In re Sch. Asbestos Litig.*, 977 F.2d 764, 776 (3d Cir. 1992) (applying similar principles to protect litigation-related statements from retaliatory claims).

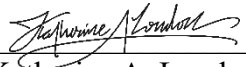
Federal courts, including the Seventh Circuit, routinely apply this state-law privilege in federal proceedings where, as here, the underlying claims involve state tort-like elements (e.g., defamation implied in "scurrilous" allegations). Imposing sanctions under Fed. R. App. P. 46 for such privileged statements would undermine the privilege's purpose, deterring attorneys from raising legitimate recusal issues and violating due process. See *Chambers v. NASCO, Inc.*, 501 U.S. 32, 44 (1991) (courts' inherent sanction powers must yield to absolute immunities); see also *Buckley v. Fitzsimmons*, 20 F.3d 789 (7th Cir. 1994) (discussing limits on prosecutorial immunity but affirming absolute protection for in-court acts).



28 U.S.C. §§144 and 455, *Liteky*, *Baskes*, and related authorities. It eschews scurrilous or unfounded claims by relying on documented evidence—court filings, exhibits, public records, and sworn certifications—presented in a professional manner to preserve judicial integrity and Plaintiff's due process rights. Any characterization otherwise would misconstrue the Motion's evidentiary foundation and legal purpose.

For these reasons, undersigned counsel respectfully submits that good cause exists to discharge the Order to Show Cause without discipline. The filings were made in good faith, based on facts, evidence, and law, and do not rise to conduct unbecoming or a rule violation.

Respectfully submitted,

/s/   
Katherine A. London

Katherine A. London  
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Dated: October 20, 2025

# EXHIBIT E

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Everett McKinley Dirksen  
United States Courthouse  
Room 2722 - 219 S. Dearborn Street  
Chicago, Illinois 60604



Office of the Clerk  
Phone: (312) 435-5850  
www.ca7.uscourts.gov

SANCTION ORDER

November 7, 2025

By the Court:

No. 25-2589	<p>RAYMOND E. BUTLER II, Plaintiff - Appellant</p> <p>v.</p> <p>ELI JACKFINN EDDI, et al., Defendants - Appellees</p> <p>and</p> <p>CIBC BANK USA, Appellee</p>
<b>Originating Case Information:</b>	
District Court No: 1:25-cv-04443 Northern District of Illinois, Eastern Division District Judge Georgia N. Alexakis	

The following are before the court:

1. **PLAINTIFF-APPELLANT'S MOTION TO DISQUALIFY JUDGE NANCY L. MALDONADO**, filed on September 24, 2025, by Attorney Katherine London.
2. **REPLY IN RESPONSE TO ORDER TO SHOW CAUSE UNDER FED. R. APP. P. 46**, filed on October 20, 2025, by Attorney Katherine London.

On September 24, 2025, appellant Raymond Butler—through his counsel, Katherine London—filed a motion to disqualify Judge Maldonado, levying scurrilous and unfounded accusations of judicial misconduct and ideological bias. On October 3, 2025, Judge Maldonado denied the disqualification request, and on October 10, 2025, this court issued an order for Ms. London to show cause why she should not be sanctioned. In her response, Ms. London took no

responsibility for her actions and continued to present unsupported allegations denigrating Judge Maldonado's conduct and character. Ms. London's lack of respect for members of the court is not isolated to this appeal—she filed a similar motion with similarly egregious allegations against Judge Alexakis in the district court, and she previously accused a panel of this court of engaging in “judicial activism” and “lawfare.”

Under Rule 46 of the Federal Rules of Appellate Procedure, we may suspend, disbar, or discipline a member of our bar “for conduct unbecoming a member of the bar.” Fed. R. App. P. 46(b), (c). The Supreme Court has broadly construed the Rule to encompass “conduct contrary to professional standards that shows an unfitness to discharge continuing obligations to clients or the courts[] or conduct inimical to the administration of justice.” *In re Snyder*, 472 U.S. 634, 645 (1985).

Ms. London's conduct—including her unwillingness to take responsibility for her actions—meets that bar. This court's standards of professional conduct require that all attorneys “speak and write civilly and respectfully in all communications with the court” and that they “not knowingly misrepresent, mischaracterize, misquote, or miscite facts ... in any oral or written communication to the court.” Standards for Professional Conduct Within the Seventh Federal Judicial Circuit. Ms. London has repeatedly shown disrespect for members of this court and knowingly misrepresented facts in court filings.

Accordingly, **IT IS ORDERED** that attorney Katherine London shall pay a fine of \$750 to the clerk of court within 30 days of this order. The clerk of court shall forward a copy of this order, which serves as a public reprimand, to the Attorney Registration and Disciplinary Commission of the Illinois Supreme Court for any action it deems appropriate. Further conduct of this nature could result in additional sanctions.