

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

RAYMOND E. BUTLER II,	)	
Plaintiff,	)	
v.	)	Case No. 1:25-cv-04443
ILLANA EDDI and ELY EDDI, individually	)	
and as Trustees of the Jack Finn Irrevocable	)	
Trust,	)	
Defendants.	)	
	)	
	)	
	)	

DEFENDANT’S REPLY IN SUPPORT OF RULE 11 MOTION FOR SANCTIONS

Defendant Ilana Eddi (“Movant”) replies in support of Defendant’s Rule 11 Motion for Sanctions (“Sanctions Motion”) as follows:

This is an extraordinary case. The sanctions requested by Movant are necessary and appropriate to stop Plaintiff’s harassment and frivolous motion practice. Plaintiff’s response to the Sanctions Motion is unrepentant and confirms that his harassing behavior will continue absent meaningful sanctions.

A. The Rule 11 Motion for Sanctions is Timely.

Plaintiff’s contention that Movant unreasonably delayed filing the Sanctions Motion is incorrect. Although Plaintiff’s motions that prompted the Sanctions Motions were filed on September 10, 2025 (Dkt. 226) and October 31, 2025 (Dkt. 233), this case was stayed and no response or motions could have been properly filed by Movant at that time. (Dkt. 227.) Due to the stay, a briefing schedule was not set on Plaintiff’s motions until May 21, 2026. (Dkt. 265.) Movant timely responded to the motions by the date set by this Court and filed the Sanctions Motion shortly thereafter on June 18, 2026. The Sanctions Motion was timely.

B. Movant Served the Rule 11 Motion More Than 21 Days Before Filing.

On May 14, 2026 – in response to threats made by Plaintiff – Movant’s counsel sent a letter to Plaintiff’s then-counsel, Racine Miller, requesting that Plaintiff withdraw his frivolous motions and reserving the right to file a motion for sanctions under Rule 11 if Plaintiff failed to do so. (Exhibit B to Rule 11 Motion.) Plaintiff wrongly claims that this letter was the only notice to him and that the Sanctions Motion was filed on May 26, 2026. It was not. The Sanctions Motion was served on Plaintiff on May 26, 2026, and then filed, along with an Affidavit of Service, more than twenty-one days later on June 18, 2026. (Dkts. 268 and 269.) Movant fully complied with Rule 11(c)(2) and Plaintiff had ample opportunity to withdraw his frivolous and harassing motions but declined to do so.

C. Plaintiff is Responsible for the Sanctionable Conduct.

Plaintiff’s contention that he should not be held responsible because his former counsel signed the frivolous and harassing motions has no merit. Plaintiff is now acting pro se and personally refused to withdraw the frivolous motions. As a pro se litigant Plaintiff has continued filing frivolous motions. (Dkts. 254, 256, 257.) Moreover, “it is well established that attorneys’ actions are imputed to their clients, even when those actions cause substantial harm. A litigant bears the risk of errors made by his chosen agent.” *Xped LLC v. Entities Listed on Exhibit 1*, 690 F. Supp. 3d 831, 860–618 (N.D. Ill. 2023) (quoting *Hinterberger v. City of Indianapolis*, 966 F.3d 523, 529 (7th Cir. 2020)). Plaintiff is responsible for the sanctionable conduct.

WHEREFORE, Movant requests that this Court enter an order granting the relief requested by the Sanctions Motion.

Dated: July 28, 2026

Respectfully submitted,

ILANA EDDI

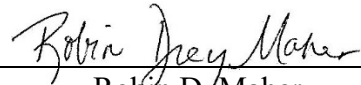
By: Robin D. Maher
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of July, 2026, a true and correct copy of the foregoing was served by CM/ECF and e-mail on all parties of record by operation of the Court's electronic filing system.



Robin D. Maher