

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

RAYMOND E. BUTLER, II,	)	
	)	
Plaintiff,	)	Case No. 1:25-cv-04443
	)	
v.	)	
	)	
ELI JACKFINN EDDI a/k/a ELY EDDI,	)	
<i>et al.</i> ,	)	
	)	
Defendants.	)	

**STATEMENT IN SUPPORT OF FEE AWARD AGAINST PLAINTIFF
AND IN FAVOR OF DEFENDANT ILANA EDDI**

Pursuant to this Court’s Order and Opinion granting Defendant Ilana Eddi’s (“Defendant Eddi”) Rule 11 Motion for Sanctions and ruling that “Plaintiff is ordered to pay the reasonable attorneys’ fees and costs attributable to the motion to disqualify Attorney Maher, accruing from May 21, 2026,” and ordering Defendant Eddi to submit an itemized proposal for its reasonable attorneys’ fees and costs incurred after May 21, 2026, Defendant Eddi hereby states as follows:

1. Defendant Eddi incurred \$23,739.00 since May 21, 2026, responding to the Motion to Disqualify Attorney Robin Maher and the successful Rule 11 Motion for Sanctions.¹
2. The services are itemized and described with particularity in the Statement of Fees attached hereto as **Exhibit A**, which shows the date, task description, identity of the professional, hours, rate, and total amount charged for each line item.

¹ Federal Rule 11(c)(2) specifically authorizes the court to award “the prevailing party [on a motion for sanctions] the reasonable expenses, including attorney’s fees, incurred for the motion.” Defendant Eddi submits a proposal for reimbursement of her attorney’s fees that were caused by the frivolous Motion to Disqualify Attorney Maher including the successful Rule 11 Motion for Sanctions, which was required to hold Plaintiff accountable for his frivolous motion and other related harassing conduct.

3. The Statement of Fees was compiled using contemporaneous billing records and invoices issued to Defendant Eddi and kept in the ordinary course of business by Levenfeld Pearlstein, LLC and is an accurate reflection of the tasks performed, the time expended, and the attorneys' fees incurred by Defendant Eddi in relation to the Motion to Disqualify Attorney Robin Maher and the Rule 11 Motion for Sanctions.

4. The attorneys' fees described in the Statement of Fees are reasonable in light of the skill and standing of the attorneys involved, the degree of responsibility required, the importance of the matter and benefit to the client, the direct connection between the fees charged and the Motion to Disqualify Attorney Robin Maher and the related Rule 11 Motion for Sanctions, and the usual and customary charges for comparable services in Chicago, Illinois.

5. Attorney Robin D. Maher is the supervising attorney for this matter. Attorney Maher has been licensed to practice law in the State of Illinois since 2004 and has been admitted and qualified to practice in the United States District Court for the Northern District of Illinois since 2008. Attorney Maher is a partner at Levenfeld Pearlstein, LLC and handles complex trust, estate, and fiduciary-related litigation. Attorney Maher is a Fellow with the American College of Trust and Estate Counsel (ACTEC), a peer elected organization based on professional reputation, experience in the fields of trusts and estates, and substantial contributions to these fields through lecturing, writing, teaching, and bar activities. Attorney Maher is also rated Band I by Chambers High Net Work Guide for Private Wealth Disputes. Attorney Maher earned her J.D., with high distinction, from University of Iowa College of Law in 2004, where she was elected to the Order of the Coif. Attorney Maher's hourly rate for this matter is \$875, is based upon her experience, reputation, ability, and skill requisite to perform the services properly and the fees customarily charged in Chicago, Illinois, for such services.

6. Attorney Erin M. Mayer has been licensed to practice law in the State of Illinois since 2013 and has been admitted and qualified to practice in the United States District Court for the Northern District of Illinois since 2016. Attorney Mayer is a partner at Levenfeld Pearlstein, LLC, concentrating on general and commercial litigation as well as trusts and estates litigation. Attorney Mayer earned her J.D. from Chicago-Kent College of Law in 2013. Attorney Mayer has been listed as Rising Star by Illinois Super Lawyers. Attorney Mayer's hourly rate for this matter is \$670, which is based upon her experience, reputation, ability, and skill requisite to perform the services properly and the fees customarily charged in Chicago, Illinois, for such services.

7. The hourly rate of \$405 charged for the services of the paralegal involved in this matter and the hourly rate of \$260 charged for the services of the litigation support specialist involved in this matter are reasonable based on the fees customarily charged in Chicago, Illinois, for such services.

8. Defendant Eddi requests that this Court enter an order requiring Plaintiff to pay her reasonable attorneys' fees in the total amount of \$23,739.00.

Dated: October 1, 2026.

Respectfully Submitted,

ELY EDDI

By: /s/ Robin Maher
As one of his attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 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.

/s/ Robin Maher

EXHIBIT A

STATEMENT OF FEES

Date	Task Description	Professional	Hours	Rate	Amount
5/21/2026	Attend hearing in federal court. Work on motion for sanctions.	Robin D. Maher	4.40	\$ 875.00	\$ 3,850.00
5/22/2026	Work on Rule 11 Motion for Sanctions, research re citations for same.	Robin D. Maher	5.90	\$ 875.00	\$ 5,162.50
5/26/2026	Review and revise Rule 11 Motion for Sanctions; email correspondence regarding service of same.	Robin D. Maher	4.00	\$ 875.00	\$ 3,500.00
5/26/2026	Cite check and revise Rule 11 Motion for Sanctions; serve same on opposing counsel, per notice period requirement.	Kirstin N. Flynn	4.80	\$ 405.00	\$ 1,944.00
5/27/2026	Draft/revise Response to Motion to Disqualify Maher in Federal Case (.5).	Erin M. Mayer	0.50	\$ 670.00	\$ 335.00
5/28/2026	Draft/revise Response to Motion to Disqualify Maher and research law in support of same (4.2).	Erin M. Mayer	4.20	\$ 670.00	\$ 2,814.00
5/29/2026	Draft/revise Response to Motion to Disqualify Maher.	Erin M. Mayer	1.50	\$ 670.00	\$ 1,005.00
5/29/2026	Review and revise response to Motion to DQ in Federal Case.	Robin D. Maher	1.80	\$ 875.00	\$ 1,575.00
6/4/2026	Cite check and assemble exhibits for Response to Motion to Disqualify R. Maher.	Kirstin N. Flynn	2.60	\$ 405.00	\$ 1,053.00
6/4/2026	Review, revise and finalize Response to Motion to DQ Maher for filing.	Robin D. Maher	0.80	\$ 875.00	\$ 700.00
6/18/2026	Draft affidavit of service for Motion for Sanctions related to 21-day service rule.	Kirstin N. Flynn	0.40	\$ 405.00	\$ 162.00
7/24/2026	Draft reply in support of Rule 11 sanctions briefing.	Robin D. Maher	1.40	\$ 875.00	\$ 1,225.00
7/28/2026	Revise and coordinate filing of Reply in Support of Motion for Sanctions; serve same on opposing counsel.	Kirstin N. Flynn	0.70	\$ 405.00	\$ 283.50
7/28/2026	File reply In Support of Motion for Sanctions with the Illinois Northern District Court.	Izabela Kropiewnicka	0.50	\$ 260.00	\$ 130.00
TOTAL					\$ 23,739.00