

RAYMOND E. BUTLER, II,

Plaintiff,

v.

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

Defendants.

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Case No. 1:25-cv-04443

Hon. April M. Perry

Defendants Chaim Rajchenbach and Menachem Shabat (collectively, “Movants”) move this Court to impose sanctions against Plaintiff Raymond E. Butler II and his attorneys, Racine Miller and Katherine London, pursuant to Federal Rule of Civil Procedure 11(c), the Court’s inherent authority, and 28 U.S.C. § 1927. This Motion should be granted for the reasons set forth in the Memorandum Supporting Defendants Chaim Rajchenbach and Menachem Shabat’s Motion for Sanctions (“Memorandum in Support”), filed concurrently herewith.

On August 22, 2025, Movants served Plaintiff’s counsel with the Memorandum in Support, along with a letter demanding that Plaintiff withdraw the “Verified Ex Parte Emergency Motion to Vacate Stay, Vacate Protective Order, Freeze Trust Assets, and Appoint Neutral Fiduciary to Preserve Trust Res” (the “Emergency Motion”), in compliance with Rule 11(c)(2). Plaintiff’s counsel did not withdraw the Emergency Motion, and the Court conducted an evidentiary hearing over several hours, involving more than a dozen attorneys. The Court denied the Emergency Motion that same day. Before Movants could file this motion for sanctions, Plaintiff appealed the denial of the Emergency Motion.

On September 11, 2025, the Court issued an order that it was divested of jurisdiction over the merits of this action while the appeal was pending, and stayed any motion practice, even over ancillary motions, until resolution of the appeal. (Dkt. 227.) Accordingly, Movants did not file this motion for sanctions on September 15, 2025 (after expiration of the safe harbor) as Movants had represented they would at the August 27 hearing on the Emergency Motion.

By Order dated May 27, 2026, the Seventh Circuit affirmed the Court's denial of the Emergency Motion. The next day, the Seventh Circuit issued a separate order sanctioning London for "fail[ure] to comply with judicial orders, ma[king] unfounded accusations against judges, and multipl[y]ing the litigation with both unwarranted proceedings and gratuitous filings." (*In the Matter of: Attorney Katherine A. London*, No. D-26-01, May 28, 2026 Order at 4.) The Seventh Circuit expressly ruled that its May 28 Order "does not prevent the defendants from seeking additional sanctions in the district court." (*Id.* at 5.)

Accordingly, Movants now file this Motion for Sanctions.

In the time since Movants served their Rule 11 letter and draft motion on August 22, 2025, Plaintiff and his counsel have only escalated their misconduct, filing numerous frivolous and improper submissions. That unbroken pattern warrants the case-terminating sanction of dismissal of Plaintiff's claims with prejudice.

WHEREFORE, for the reasons set forth in the Memorandum in Support, Movants respectfully request that the Court: (1) impose monetary sanctions on Plaintiff and his counsel, Racine Miller and Katherine London, in an amount that includes the attorneys' fees and costs Movants have incurred; (2) require Plaintiff and his counsel to seek leave of Court before filing any further papers in this case; (3) dismiss Plaintiff's claims with prejudice as a case-terminating sanction; and (4) grant such other and further relief as the Court deems just and proper.

Pursuant to the Court's Standing Order, Movants proposed to the parties a briefing schedule of (i) **21 days** after the Motion is filed to file a Response to this Motion, and (ii) **7 days** thereafter for any Reply. Plaintiff Butler and attorneys Miller and London did not agree to this proposal.

Miller proposed an alternative briefing schedule: (i) **28 days** to file a Response to the Motion with an enlarged page limit of 25 pages; (ii) **14 days** thereafter for any Reply with an enlarged page limit of 20 pages; and (iii) that Miller be given the right, without leave of Court, to file a 10-page Sur-Reply **7 days** thereafter. Movants rejected Miller's counterproposal because it materially deviates from this Court's default briefing schedules and page limits under Local Rule 7.1.

Butler and London did not respond to Movants' proposed briefing schedule or provide any counterproposal despite multiple attempts to reach them via email over the last three days.

Dated: July 17, 2026

Respectfully submitted,

/s/ Nicholas H. Callahan

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2026, I caused a true and correct copy of the foregoing to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Nicholas H. Callahan