

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

RAYMOND E BUTLER, II,

Case No. 25-2589

Plaintiff-Appellant,

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 SOLOVEICHIK, 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.

Defendants.

PETITION FOR WRIT OF MANDAMUS

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Petitioner Raymond E. Butler II, by and through undersigned counsel, respectfully petitions this Court for a writ of mandamus, pursuant to the All Writs Act, 28 U.S.C. § 1651(a), 28 U.S.C. § 455(a) and 28 U.S.C. § 455(b), directing the Honorable April M. Perry to recuse herself forthwith from all further proceedings in *Butler v. Eddi, et al.*, No. 1:25-cv-04443 (N.D. Ill.) or in the alternative order the consolidation of this action (No. 1:25-cv-04443) with the related RICO action (No. 1:25-cv-10904) under Judge Valderrama.

I. INTRODUCTION AND RELIEF REQUESTED

The Motion to Disqualify Judge April M. Perry expressly alleges that Judge Perry's own judicial appointment, like those of other Biden-era judges, including Judge Alexakis, was executed via autopen by unelected White House gatekeepers while the President was incapacitated, rendering the appointment void ab initio under Article II, § 2 of the U.S. Constitution. Every act Judge Perry takes in this litigation is therefore alleged to be *ultra vires*. Judge Georgia N. Alexakis already recused herself from this very matter on these identical constitutional grounds.

Additional circumstances, independently and cumulatively, create an indisputable appearance that Judge Perry's impartiality "might reasonably be questioned" by any objective observer. Most critically, Judge Perry holds

substantial assets in Vanguard and serves as Trustee of a revocable family trust that may or may not hold additional investments in Vanguard, which in turn manages billions of dollars of assets in the very trusts at issue in this litigation. Appellant states throughout the filings that his grandfather established the Private Trust Bank of Chicago which was purchased by Canadian Imperial Bank of Commerce in 2017.¹ Any ruling in this case favorable to the Plaintiff would have a significant adverse impact on Vanguard. Vanguard holds a significant portion of the stock in CIBC (the bank that acquired the Private Trust Bank of Chicago) for the benefit of the very trusts central to this litigation. At the same time, Vanguard simultaneously and actively manages that same CIBC stock along with the other assets owned by those trusts. Consequently, a plaintiff-favorable ruling could cause Vanguard to suffer both (i) a direct decline in the value of its CIBC stock holdings and (ii) the loss of substantial assets under management — together with the substantial management fees generated by those assets — if the trusts' asset-management arrangements are altered, restructured, or terminated.

These facts create a direct and substantial conflict of interest. Because Judge Perry is heavily invested in Vanguard, or her family trust is invested, she stands to receive (or lose) material pecuniary benefits, through dividends, commissions, advisory fees, and capital appreciation, depending on how Vanguard fares in this litigation. Vanguard's dual role as both a major

¹ <https://www.sec.gov/Archives/edgar/data/889936/000104746916016408/a2230174zdefm14a.htm>

shareholder in the acquired bank and one of the asset managers for the very trusts being litigated means that the outcome of the case will almost certainly affect Vanguard's revenue streams and share value. A ruling that gives possession to the beneficiary would almost certainly result in altered management arrangements, and impact the bank's operations and would therefore translate into a measurable financial loss for Vanguard and, by direct extension, for Judge Perry's portfolio and/or family trust holdings.

This is not a remote or attenuated interest; it is a concrete, personal financial stake that gives Judge Perry an economic incentive in the litigation's result. Under judicial ethics standards, such a pecuniary interest requires recusal because it compromises both the fact and the appearance of impartiality. The public cannot reasonably trust that a judge whose family wealth is tied to Vanguard's success or failure will decide the case solely on the merits rather than with an eye toward protecting or enhancing her own investments.

Additionally, Judge Perry's 2025 Financial Disclosure Report lists her as Director (Chair or Vice Chair) of an unnamed "Non-Profit," with the organization's identity redacted and withheld from public view, unlike her earlier OGE Form 278e financial disclosure filed in connection with her U.S. Attorney nomination, where she fully identified the same entity as the Wesley Child Care Center (Glenview, Illinois) and reported serving on its Board of Directors since April 2018. This sudden lack of transparency regarding a

leadership role at a non-profit raises legitimate questions about whether the organization could serve as a vehicle for funneling or concealing additional financial interests, particularly in a case involving substantial asset-management fees and institutional investments like those at issue here. The contrast between her prior full disclosure and the current redaction only deepens the appearance of potential conflicts and undermines public confidence in her impartiality. For reference, her Financial Disclosure Report (AO Form 10, filed March 11, 2026) confirms extensive personal and fiduciary exposure to Vanguard-managed assets, including:

- Vanguard 500 Index Fund v1 (\$100,001–\$250,000) and v2 (\$15,001–\$50,000);
- Vanguard Institutional Total Stock Market Index Trust Unit C (\$500,001–\$1,000,000);
- Vanguard Institutional Total International Stock Market Index Trust Unit C (\$100,001–\$250,000);
- Vanguard Target Retirement 2035 Funds v1 and v2 (each \$50,001–\$100,000);
- Vanguard Target Retirement 2030 Fund;
- multiple Vanguard Total Stock Market Index 529 Portfolios and Vanguard Total Bond Market Index 529 Portfolios (with values ranging from \$15,001–\$50,000 up to \$100,001–\$250,000); and
- additional Vanguard Institutional Total Stock Market and bond index holdings.

These holdings create a direct financial interest in the outcome of the litigation.

Petitioner's counsel disclosed Judge Perry's disqualifying financial conflict, her substantial Vanguard holdings tied directly to the trusts at issue, in the Motion to Disqualify filed on March 30, 2026 (Exhibit A -ECF 245). On April 8, 2026, the American Bar Association issued Formal Opinion 522, which expressly confirms that a lawyer who possesses information reasonably likely to require a judge's recusal has an affirmative duty under Model Rule 8.4(d) to disclose that information to the tribunal. (Exhibit B) This timing underscores that counsel properly fulfilled her ethical obligations as an officer of the court when she raised the Vanguard conflict in the disqualification motion.

Despite the disclosure and the clear mandate of ABA Opinion 522, Judge Perry refused to recuse. At the April 9, 2026 hearing she mischaracterized Vanguard as merely a "bank" not included in the complaint, declared the disqualification motion frivolous, stated that Petitioner's counsel had received her "one free pass," and warned that any further "frivolous" filings would result in sanctions. These statements, combined with her other rulings limiting core Article II executive authority, eliminate any reasonable doubt that her impartiality might reasonably be questioned.

The official transcript of the April 9, 2026 hearing is believed to be materially inaccurate and incomplete. (Exhibit C) Witnesses to the hearing and counsel's contemporaneous notes reveal the transcript omits critical statements by Judge Perry as well as material misstatements.

Counsel requested that the reporter review her stenographic notes and any electronic backup recording, prepare an errata sheet or supplemental transcript to correct the omissions, and provide access to any audio backup recording of the hearing. No response was received to either request. (Exhibit D) Because the omitted statements bear directly on the appearance of bias and partiality, this Court should order immediate production of the official audio recording of the April 9, 2026 hearing so that the full record can be reviewed.

Because continued participation by an allegedly unconstitutionally appointed judge with a demonstrated financial stake and overt hostility combined with an inaccurate record of a proceeding would irreparably undermine public confidence in the fairness of these proceedings, and because ordinary appellate review would not provide an adequate remedy, a writ of mandamus is both necessary and appropriate.

II. RELEVANT FACTS

This action was reassigned to Judge Perry on March 19, 2026, only days before the filing of Plaintiff-Appellant's Motion for Disqualification, after Judge Alexakis granted Plaintiff-Appellant's motion for her own disqualification on identical constitutional and RICO-related grounds. The case was briefly reassigned to the Honorable Thomas M. Dirkin, who requested a transfer, and was then docketed on Judge Perry's calendar. No substantive proceedings have

occurred under Judge Perry. The pending injunction remains on appeal with no further action taken.

The complaint in the related civil RICO action pending before Judge Valderrama (1:25-cv-10904), directly attacks the constitutional validity of Judge Perry's own judicial nomination and confirmation. Plaintiff-Appellant alleges that numerous Biden-era appointments, including Judge Perry's, were not personally executed by the President but by unelected aides using an autopen. These appointments are alleged void *ab initio*, stripping the affected judges of any lawful authority and eliminating judicial immunity. Judge Perry therefore has a direct, personal, and non-speculative interest in the outcome.

On April 9, 2026, the Court held a hearing on the Motion to Disqualify. The motion was denied. (Exhibit E -ECF 249) During that hearing, Judge Perry exhibited clear bias, hostility, and prejudgment. She stated that the Seventh Circuit had already opened an ARDC referral regarding a similar disqualification motion filed by counsel and that ARDC may be reading the transcript, then expressly warned counsel "I will not tolerate any additional frivolous motions. You will be sanctioned, just as the Seventh Circuit has already sanctioned you, if you persist in this type of behavior. You didn't get any warning from the Seventh Circuit; you are getting one from me." (Transcript of Proceedings at 15:11-17, Butler v. Eddi, No. 1:25-cv-04443 (N.D. Ill. Apr. 9, 2026)) Judge Perry made numerous statements dismissing the

constitutional claims, including the autopen allegation and Vanguard financial interest, as lacking factual support or frivolous. The official transcript of these proceedings is materially incomplete insofar as it does not reflect the full strength of her statements regarding her relationship with Judge Alexakis (transcript p. 5 records only “we are friends,” whereas she described the relationship more emphatically and in more detail on the record).

On April 9, 2026, counsel promptly ordered the official transcript of the hearing before Judge April M. Perry. After receiving the transcript and upon review on or about April 14, 2026, counsel emailed the court reporter, Ms. Noreen Resendez, identifying a material inaccuracy in the April 9, 2026 transcript: opposing counsel had stated on the record that she intended to file an **answer**, yet the transcript incorrectly rendered the statement as an intention to file a **motion to dismiss** (Transcript of Proceedings at 17:1-5, *Butler v. Eddi*, No. 1:25-cv-04443 (N.D. Ill. Apr. 9, 2026)). Additionally, the transcript omitted several statements made by Judge Perry on the record that were material to the pending motion for disqualification, including the Court’s declaration that “not only am I friends with Judge Alexakis I am VERY good friends with her,” as well as further descriptions of Judge Perry’s professional and personal relationships with both Judge Alexakis and Judge Maldonado. Judge Perry admonished counsel that “you take issue with my local Rule 44 analysis under which I applied the local rule. A judge's application of the law or rule as written is hardly a reasonable basis to disqualify the judge.” (Transcript

of Proceedings at 14:1-6, *Butler v. Eddi*, No. 1:25-cv-04443 (N.D. Ill. Apr. 9, 2026) That is inaccurate on several counts: (1) There is no Rule 44 in the Northern District of Illinois civil division, so the transcript itself is incorrect; (2) Judge Perry stated at the hearing that Appellant's counsel "filed a complaint against her interpretation of Rule 40.4," which is inaccurate; and (3) counsel actually filed a motion in another case on behalf of the same Appellant requesting a deviation from Local Rule 40.4. Moreover, by referencing counsel's motion seeking a deviation from Local Rule 40.4 filed in a completely separate case involving the same Plaintiff-Appellant, a matter never mentioned anywhere in the disqualification motion and about which no complaint was ever filed, Judge Perry revealed that she had independently searched and reviewed Plaintiff-Appellant's other pending litigation to find material with which to admonish counsel, an extrajudicial inquiry that itself demonstrates bias and further erodes any appearance of impartiality.

Counsel requested that the reporter review the court recording to confirm the accurate wording. No response was received to this request. On April 16, 2026, counsel sent a second formal email to Ms. Resendez, copying Court Reporter Coordinator Rosemary Scarpelli, identifying additional and far more significant omissions in the same transcript. Counsel requested that the reporter review her stenographic notes and any electronic backup recording, prepare an errata sheet or supplemental transcript to correct the omissions, and provide access to

any audio backup recording of the hearing. No response was received to this second request either.

Of note, the Official Court Reporter Noreen Resendez initially estimated the proceeding at 50 pages and issued an invoice in the amount of \$55.00 based on the 7-day delivery rate. (Exhibit F). After receiving payment and delivering the transcript just days later, Ms. Resendez admitted that she had significantly overestimated the total pages from that morning and informed counsel that a \$33.00 refund was due. Given the extremely short time between the hearing and the production of the transcript, such a large overestimation is unusual and raises legitimate questions about whether substantial portions of the hearing may have been omitted from the final transcript.

On April 15, 2026, counsel sent a formal FRE 408 settlement demand letter to counsel for the Catholic Bishop of Chicago, the Archdiocese of Chicago, Maryville Academy, and related entities. (Exhibit G). The letter constituted final notice of intent to file suit and demanded a full settlement of claims arising from the repeated and severe childhood sexual abuse Plaintiff endured at Maryville Academy between 1999 and 2003, the exact same crimes perpetrated against him by Matthew Whited, for which Whited remains criminally responsible and for which this very Court recently denied him compassionate release in *United States v. Whited*, No. 24-2849 (7th Cir. June 17, 2025), including Civil RICO, childhood sexual abuse, battery, negligent

supervision, fraudulent concealment, and Illinois RICO claims. This fact alone underscores the profound weight and importance of the relief sought in this mandamus petition.

In the precise window of April 15–17, 2026, while counsel was simultaneously (a) preparing and transmitting that demand letter against the Archdiocese entities, (b) seeking correction of the materially inaccurate April 9 transcript before Judge Perry, and (c) pressing the disqualification motion, IP logs for KMFL Law’s website (kmflaw.com) reflect multiple coordinated visits from Administrative Office of the United States Courts IP addresses and Italian Internet Service Providers (ISP) publicly linked to the Vatican as well as individuals directly linked to the Maryville/Archdiocese offer of compromise, some of whom are already defendants in this case. These accesses occurred in rapid succession and/or simultaneously.

The very next day, April 17, 2026, the Northern District of Illinois Executive Committee suspended counsel Katherine A. London from practice in the Northern District of Illinois pursuant to Local Rule 83.26(c), with no prior warning, no 14-day letter, and no hearing, in direct violation of the rule’s procedural safeguards. (Exhibit I)

This extraordinary temporal proximity, combined with the coordinated website traffic between United States Courts administrative IPs and the Vatican as well as individuals directly linked to the Archdiocese offer of

compromise shows the enterprise likely acted in concert to remove counsel as Petitioner's representative in any case involving Butler, silence her exposure of judicial bias (including the Vanguard conflict she was ethically required to disclose under ABA Formal Opinion 522), and obstruct justice in both the *Eddi* and RICO actions.

The Seventh Circuit's underlying sanction order to counsel for filing a motion to disqualify Judge Maldonado (dated Nov. 7, 2025) was itself issued without any prior notice or opportunity to be heard. It took the form of an unsigned "By the Court" order bearing no individual judicial signatures. Subsequent denial orders on en banc review and rehearing (Nov. 19 and 21, 2025) were likewise issued anonymously in the same unsigned format (Exhibits J 1-3).

III. MANDAMUS IS WARRANTED BECAUSE JUDGE PERRY'S REFUSAL TO RECUSE CREATES A CLEAR AND INDISPUTABLE RIGHT TO RELIEF

Under 28 U.S.C. § 455(a), a judge "shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned." This is an objective standard: disqualification is required whenever "a reasonable person, knowing all the facts, would conclude that the judge's impartiality might reasonably be questioned." *Liljeberg v. Health Servs. Acquisition Corp.*, 486 U.S. 847, 861 (1988). The statute is self-executing and imposes a duty on the judge to recuse *sua sponte*. Additionally, 28 U.S.C. § 144 provides a parallel mechanism when a party files a timely and sufficient affidavit of personal bias or prejudice.

A reasonable person, knowing all the facts alleged in the complaint, Plaintiff-Appellant's pre-litigation offer of compromise sent to counsel for the Archdiocese, the anticipated related RICO action (which has not yet been filed), Plaintiff-Appellant's Motion for Disqualification, Judge Perry's Financial Disclosure Report, counsel's ABA Opinion 522 disclosure, and the events of the April 9, 2026 hearing (including the omitted transcript statements), together with the coordinated retaliation by individuals connected to the Vatican/Chicago Archdiocese, the United States Courts administrative IP's would unquestionably question Judge Perry's impartiality. These circumstances create both an actual conflict and the appearance of partiality.

Judge Alexakis correctly recognized this duty and recused. Judge Perry's refusal to do the same, especially after displaying overt bias and threats during the very hearing on the disqualification motion itself, is clear legal error warranting immediate correction by mandamus. *In re United States*, 666 F.3d 450, 452 (7th Cir. 2012) (mandamus is the proper vehicle for recusal denials presenting a "clear and indisputable" right to relief).

Because the official transcript is demonstrably incomplete on the very issue of Judge Perry's personal relationships and bias, this Court should order production of the audio recording of the April 9, 2026 hearing before ruling on this petition.

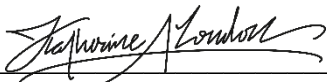
IV. PRAYER FOR RELIEF

For the foregoing reasons, Petitioner respectfully requests that this Court:

- (a) issue a writ of mandamus directing Judge April M. Perry to recuse herself immediately under 28 U.S.C. § 455(a) and ordering immediate reassignment of No. 1:25-cv-04443 by the Executive Committee of the Northern District of Illinois; **OR**
- (b) in the alternative, order the consolidation of this action (No. 1:25-cv-04443) with the related RICO action (No. 1:25-cv-10904) under Judge Valderrama;
- (c) Order a recording of the April 9, 2026 hearing to ensure a correct record.

Respectfully submitted,


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/s/ 
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CERTIFICATE OF SERVICE

I certify that on April 20, 2026, this Petition (and all exhibits) was filed electronically via the Seventh Circuit CM/ECF system and served on all parties via the CM/ECF notice system and by email to opposing counsel of record.

Respectfully submitted,

/s/ 
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Attachments:

Exhibit A – Plaintiff-Appellant’s Motion to Disqualify Judge April M. Perry
Exhibit B – ABA Formal Opinion 522 (April 8, 2026)
Exhibit C – Official Transcript of April 9, 2026 hearing before Judge Perry
Exhibit D – Emails to court reporter Noreen Resendez dated April 14 and 16, 2026
Exhibit E – Minute Order (ECF 249) – April 9, 2026
Exhibit F – Emails to court reporter Noreen Resendez dated
Exhibit G – FRE 408 settlement demand letter to counsel for the Catholic Bishop of Chicago, the Archdiocese of Chicago, Maryville Academy.
Exhibit H– KMFL Law IP Logs (April 2026)
Seventh Circuit Sanctions Order (Nov. 7, 2025) and denial orders
Exhibit I – Order from Executive Committee dated April 17, 2026
Exhibit J 1-3– Sanction Order from Seventh Circuit, Motion for en banc Denial, Denial of hearing

EXHIBIT A

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

RAYMOND E BUTLER, II,

Case No. 1:25-cv-04443

Hon. April M. Perry

Plaintiff,

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 SOLOVEICHIK, 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. ANTEBEL.

Defendants.

**PLAINTIFF’S MOTION FOR DISQUALIFICATION OF THE
HONORABLE APRIL M. PERRY PURSUANT TO 28 U.S.C. §455 AND
§ 144**

Plaintiff Raymond E. Butler II, by and through counsel, respectfully moves this Court pursuant to 28 U.S.C. § 455(a) (and, to the extent applicable, §§ 455(b) and 144) for disqualification of the Honorable April M. Perry. In support thereof, Plaintiff states as follows:

I. INTRODUCTION AND RELIEF REQUESTED

This action was reassigned to Judge Perry on March 19, 2026, only ten days ago, following the prior judge’s (Alexakis) self-recusal on Plaintiff’s motion. The case has had zero substantive activity under Judge Perry: no Rule 16 scheduling conference has been set, no discovery has commenced, no rulings

have issued, and the pending injunction remains on appeal with no further action taken.

Continued assignment of this matter to Judge Perry creates, at minimum, the appearance that her impartiality “might reasonably be questioned” by an objective observer. 28 U.S.C. § 455(a). Plaintiff therefore requests that Judge Perry disqualify herself and that the case be immediately reassigned by the Executive Committee pursuant to the Court’s Internal Operating Procedures.

II. FACTUAL BACKGROUND

1. This Underlying Action (1:25-cv-04443) was filed on August 6, 2024. On March 13, 2026, the prior judge granted Plaintiff’s motion for her disqualification. The case was briefly reassigned to the Honorable Thomas M. Dirkin, who requested a transfer, and was then reassigned to Judge Perry on March 19, 2026. (Exhibits A–D).
2. Judge Perry previously worked in the same federal office as Judge Alexakis during her tenure as an Assistant United States Attorney in the Northern District of Illinois and maintains a professional relationship with her former colleague who is now a defendant in the action arising from this case, 1:25-cv-10904.
3. The complaint in this action, together with the related civil RICO action (1:25-cv-10904) pending before the Honorable Franklin U. Valderrama,

contains allegations and claims that directly implicate the judicial process, prior rulings, and arguments that call into question the constitutional validity of Judge Perry's own judicial nomination and confirmation by President Biden. Specifically, Plaintiff alleges that numerous judicial appointments made during the Biden Administration, including those of Judges Alexakis, Maldonado, and Judge Perry herself, are constitutionally invalid because they were executed via autopen rather than by the President's own hand, in violation of Article II, Section 2 of the U.S. Constitution.

Defendants in the RICO action lack judicial immunity because their appointments violate the requirement that the President personally nominate judges "by and with the Advice and Consent of the Senate." Public records, articles, and testimony raise serious doubts about whether President Biden personally reviewed and approved these nominations amid widespread reports of his cognitive decline and mental acuity issues. Whistleblower allegations detail how "gatekeepers" in the Biden White House (including Ron Klain, Anita Dunn, Bob Bauer, Steve Ricchetti, and Jill Biden) allegedly controlled access to the autopen for executive actions, including pardons and judicial nominations, and "made money off of it" by selling access while President Biden was incapacitated or asleep. House Oversight Committee Chairman James Comer has vowed to probe Biden's 235 judicial appointments, questioning their legality and suggesting they could be

“declared null and void” due to autopen use by unelected aides. A June 4, 2025 White House memorandum confirms that the “vast majority” of Biden’s presidential actions in the second half of his presidency were signed via autopen. These invalid appointments render subsequent judicial acts *ultra vires*, stripping the affected judges of immunity under precedents such as *Marbury v. Madison*, 5 U.S. 137 (1803). Such claims create a **direct and personal stake** for Judge Perry in the outcome of this litigation.

4. Judge Perry has not made her required annual financial disclosure report publicly available as a judge pursuant to the Ethics in Government Act of 1978, 5 U.S.C. app. § 101 et seq. (and the implementing regulations of the Judicial Conference of the United States). Although she may have provided the disclosure internally, it is not accessible to the parties or the public, further contributing to the appearance of a lack of transparency regarding any potential financial or other interests that could affect her impartiality in this case. On its own, this lack of public disclosure raises reasonable concerns about undisclosed financial conflicts of which the parties and the public remain unaware. Moreover, in a previous disclosure provided to congress during her nomination for U. S. Attorney, Judge Perry’s investments show substantial involvement with Vanguard, which manages a large percentage of the Trusts’ assets which are at issue in this case.

5. In addition, Judge Perry recently issued rulings in *State of Illinois v. Trump*, No. 1:25-cv-12174 (N.D. Ill.), including an Opinion and Order signed October 10, 2025, that temporarily blocked the President's federalization and deployment of National Guard troops. These rulings have been widely reported as limiting the President's constitutional authority under Article II (as Commander in Chief) and raising separation-of-powers concerns under Article III. An objective observer could reasonably question whether such rulings reflect a broader disregard for core constitutional principles, including the separation of powers and Article III judicial authority, particularly in a case like this one that itself challenges aspects of the judicial process.

III. LEGAL STANDARD

6. Under 28 U.S.C. § 455(a), a judge “shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.” This is an objective standard: disqualification is required whenever “a reasonable person, knowing all the facts, would conclude that the judge's impartiality might reasonably be questioned.” *Liljeberg v. Health Servs. Acquisition Corp.*, 486 U.S. 847, 861 (1988).
7. The statute is self-executing and imposes a duty on the judge to recuse *sua sponte*. Additionally, 28 U.S.C. § 144 provides that when a party files a timely and sufficient affidavit stating that the judge before whom the matter is pending has a personal bias or prejudice either against the party or in

favor of an adverse party, “such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding.”

8. Local Rule 40.4 is an administrative rule promulgated by this District under the authority of 28 U.S.C. § 137, which expressly authorizes each district court to “divide its business among its judges” as provided by the rules and orders of the court. Federal Rule of Civil Procedure 83(a) further permits district courts to adopt local rules, but *only* to the extent they are “consistent with” federal statutes and the Constitution. Neither the statute nor the Federal Rule permits a local rule to override the mandatory disqualification requirements of 28 U.S.C. § 455 and § 144 or the constitutional guarantee of an impartial tribunal under the Fifth Amendment. Local Rule 40.4 cannot override this statutory and constitutional command.

IV. ARGUMENT

A. The Appearance of Partiality Arising from Judge Perry’s Professional Relationship with the Recused Prior Judge Requires Disqualification

Judge Perry’s ongoing relationship with Judge Alexakis as colleagues in the same federal office as AUSAs creates an appearance that her impartiality might reasonably be questioned, especially where the current case contains allegations that directly implicate the judicial process and prior rulings connected to that assignment. Code of Conduct for United States Judges, Canon 3(C)(1).

B. The Case Has Only Recently Been Assigned to Judge Perry, Zero Judicial Resources Have Been Invested Judge Perry received the case on March 19, 2026.

There has been no substantive progress whatsoever. Rigid application of LR 40.4's "lowest-numbered-judge" mechanism in these circumstances defeats the rule's own purpose of judicial economy and would lock this case before a judge whose impartiality is reasonably in doubt.

C. Judge Perry's Recent Rulings, Failure to File Financial Disclosures, and the Direct Implication of Her Own Biden Judicial Nomination Further Create an Appearance of Bias

An objective observer could reasonably question Judge Perry's impartiality given her recent rulings in high-profile matters involving the President's constitutional powers, including the October 10, 2025 Order in *State of Illinois v. Trump* that limited executive authority under Article II and raised Article III separation-of-powers concerns. In addition, Judge Perry has failed to file her required annual financial disclosure report pursuant to the Ethics in Government Act of 1978, 5 U.S.C. app. § 101 et seq., depriving the public (and the parties) of transparency regarding any potential interests that could affect her judgment in a case alleging judicial misconduct.

Most critically, the allegations and claims in this action (and the related RICO action) directly challenge the constitutional validity of federal judicial nominations and confirmations under the Biden Administration. Plaintiff alleges that Judge Perry's own nomination and confirmation were executed via autopen,

a mechanical device simulating the President's signature, rather than by President Biden's own hand, amid widespread reports of his cognitive decline. These appointments allegedly violate Article II, § 2's requirement of personal presidential nomination "by and with the Advice and Consent of the Senate." Whistleblower evidence and congressional investigations confirm rampant autopen abuse for executive actions (including judicial nominations), with gatekeepers allegedly profiting from access while the President was incapacitated. Such claims render the appointments void *ab initio*, stripping affected judges of immunity and rendering their acts *ultra vires*. Because resolution of these claims would necessarily call into question the legitimacy of Judge Perry's own appointment, she has a direct personal stake in the litigation's outcome. This creates an undeniable appearance of partiality under 28 U.S.C. §§ 455(a) and 455(b)(1), as well as Canon 2 of the Code of Conduct for United States Judges (requiring judges to avoid impropriety and the appearance of impropriety in all activities).

D. Judge Perry's Strict Application of Local Rule 40.4 Demonstrates That She Is Unlikely to Prioritize Constitutional Requirements Over Mechanical Procedural Rules

An objective observer could reasonably question Judge Perry's impartiality given her recent rulings in high-profile matters involving the President's constitutional powers. In *State of Illinois v. Trump*, No. 1:25-cv-12174 (N.D. Ill.), Judge Perry issued an Opinion and Order signed October 10, 2025, that temporarily blocked the President's federalization and deployment of National

Guard troops. These rulings have been widely reported as limiting the President's authority under Article II as Commander in Chief and raising separation-of-powers concerns under Article III. An objective observer could reasonably question whether such rulings reflect a broader approach to constitutional interpretation that would affect her handling of this case, which itself challenges core aspects of the judicial appointment process and Article II requirements.

In the instant case, Judge Perry's strong adherence to the mechanical, administrative provisions of Local Rule 40.4 reinforces that even in cases involving core constitutional questions of separation of powers and Article II executive authority she may not be impartial. (Exhibit E) An objective observer could reasonably question whether Judge Perry would similarly elevate the administrative "lowest-numbered-judge" mechanism of LR 40.4 over the mandatory, higher-authority disqualification requirements of 28 U.S.C. § 455(a) and § 144 and the constitutional guarantee of an impartial tribunal, particularly where, as here, the case directly implicates the legitimacy of her own judicial appointment and raises serious questions about her financial transparency and potential conflicts.


By rigidly applying LR 40.4 in constitutionally sensitive matters while failing to make her own financial disclosures publicly available, Judge Perry has created an additional layer of concern that she may not yield to the self-

executing duty to recuse when her impartiality might reasonably be questioned.

V. CONCLUSION

For the foregoing reasons, and those set forth in Plaintiff's Motion for Disqualification, Plaintiff respectfully requests that the Honorable April M. Perry disqualify herself under 28 U.S.C. § 455 and § 144 and that the case be immediately reassigned by the Executive Committee.

Respectfully submitted,


/s/ 
Katherine A. London, Esq.
Attorney for Plaintiff

KMFL Law, Inc.
Atty #: 6345920
100 Illinois St., Suite 200
St. Charles, IL 60174
klondon@kmflaw.com
630-507-9998

Dated: March 30, 2026

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2026, I served a true and correct copy of the foregoing Notice of Appeal on all parties of record by electronic filing in accordance with Rule 55(b)(2) Rule of Federal Procedure.

/s/ 
Katherine A. London, Esq.
Attorney for Plaintiff

KMFL Law, Inc.
Atty #: 6345920
100 Illinois St., Suite 200
St. Charles, IL 60174
klondon@kmflaw.com
630-507-9998

CERTIFICATE OF GOOD FAITH


I, Katherine A. London, attorney of record for Raymond Butler II, in the above-captioned matter, hereby certify pursuant to 28 U.S.C. § 144 that the Motion for Disqualification of Judge and the accompanying affidavit filed herewith are made in good faith and not for purposes of delay or any other improper purpose.

I further certify that the factual allegations contained in the accompanying affidavit are believed to be true and that the motion for judicial disqualification is based upon a genuine belief that the grounds for disqualification exist as set forth in the supporting affidavit.

This certification is made in compliance with the requirements of 28 U.S.C. § 144..

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of March, 2026.



Katherine A. London

**AFFIDAVIT OF RAYMOND E. BUTLER II IN SUPPORT OF
PLAINTIFF'S MOTION FOR DISQUALIFICATION OF THE
HONORABLE APRIL M. PERRY**


I, Raymond E. Butler II, being first duly sworn, depose and state as follows:

1. I am the Plaintiff in the underlying federal action titled *Butler v. Eddi, et al.*, Case No. 1:25-cv-04443, pending in the United States District Court for the Northern District of Illinois, Eastern Division, before the Honorable April M. Perry.
2. I am a resident of Michigan, over the age of 18, of sound mind, and competent to make this affidavit. I make this affidavit based solely on my personal knowledge, except where explicitly stated upon information and belief and as to those matters, I believe them to be true based on specific evidence reviewed, such as court records, electronic logs, and communications.
3. This is the first and only affidavit I have filed in these matters seeking disqualification of Judge April M. Perry.
4. I have read the foregoing Plaintiff's Motion for Disqualification of the Honorable April M. Perry Pursuant to 28 U.S.C. § 455 and § 144, dated March 30, 2026, and I verify that the facts alleged therein are true and correct to the best of my knowledge and belief.
5. The purpose of this affidavit is to state my belief that Judge Perry may harbor a personal bias or prejudice against me or my attorney or in favor of the adverse parties and that her impartiality might reasonably be questioned, necessitating her disqualification.
6. The facts demonstrating Judge Perry's potential personal bias or prejudice include specific circumstances which are not based solely on her judicial rulings but on extrajudicial sources and a pattern of conduct indicating an appearance of partiality, including her prior professional relationship with the recused Judge Alexakis in the same federal office as Assistant United States Attorneys, her failure to file required annual financial disclosures, her recent rulings in *State of Illinois v. Trump* that reflect a disregard for core constitutional principles under Articles II and III, and, most critically, the direct challenge in this action and the related RICO action (1:25-cv-10904) to the constitutional validity of her own judicial nomination and confirmation by President Biden via autopen, which creates a personal stake in the outcome of this litigation.

7. I believe Judge Perry may have a personal bias or prejudice against me or my attorney and in favor of the adverse parties, stemming from extrajudicial sources, and that her impartiality might reasonably be questioned.
8. This belief is held in good faith, and this affidavit is submitted timely upon discovery of the full pattern of circumstances, before any substantive proceedings have occurred under Judge Perry.

FURTHER AFFIANT SAYETH NOT.

Respectfully submitted,

/s/ 

Raymond E. Butler II

Subscribed and sworn to before me this 30th day of March, 2026.

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.8 (rev. 1.8.5)
Eastern Division**

Raymond E. Butler II

Plaintiff,

v.

Case No.: 1:25-cv-04443

Honorable Georgia N. Alexakis

Eli Jackfinn Eddi, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Friday, March 13, 2026:

MINUTE entry before the Honorable Georgia N. Alexakis: In light of Plaintiff's pending suit against this Court in Case No. 25 CV 10904, the Court grants Plaintiff's motion for disqualification [223]. Other courts have reasoned that a judge is not disqualified merely because a litigant sues or threatens to sue him, unless there is a legitimate basis for the suit. See *Andersen v. Roszkowski*, 681 F. Supp. 1284, 1289 (N.D. Ill. 1988), *aff'd*, 894 F.2d 1338 (7th Cir. 1990) (collecting cases). There is no legitimate basis for Plaintiff's suit against this Court. Nonetheless, in an abundance of caution, the Court recuses itself pursuant to 28 U.S.C. 455(a). The Court asks that the Executive Committee reassign this matter accordingly. Mailed notice. (sxh,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.8 (rev. 1.8.5)
Eastern Division**

Raymond E. Butler II

Plaintiff,

v.

Case No.: 1:25–cv–04443

Honorable Thomas M. Durkin

Eli Jackfinn Eddi, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Friday, March 13, 2026:

MINUTE entry before the Honorable Georgia N. Alexakis: – IOP 13(f)(1) – I recuse myself from this case for the following reasons: Plaintiff has a pending suit against this Court in case number 25–cv–10904. Mailed notice (ph,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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EXHIBIT B



**United States District Court
Northern District of Illinois**

In the Matter of

Raymond E. Butler, II

District Judge Thomas M. Durkin

v.

Case No. 25-CV-4443

Eddi et al

Designated Magistrate Judge
Keri L. Holleb Hotaling

**TRANSFER OF CASE TO THE EXECUTIVE COMMITTEE
FOR A REASSIGNMENT**

I request the Executive Committee that the above captioned case be reassigned by lot to another judge of this Court. The reasons for my request are indicated on the bottom of this form.

A handwritten signature in black ink that reads "Georgia N. Alexakis". The signature is written in a cursive style.

Judge Georgia N. Alexakis

Date: Friday, March 13, 2026

- IOP 13(f)(1) - I recuse myself from this case for the following reasons:
Plaintiff has a pending suit against this Court in case number 25-cv-10904.

Dated: Friday, March 13, 2026

EXCEPTIONS OR ADDITIONS:

EXHIBIT C



**United States District Court
Northern District of Illinois**

In the Matter of

Butler

v.

Eddi et al

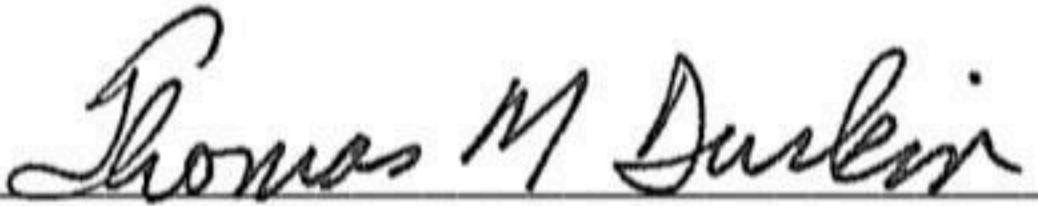
District Judge April M. Perry

Case No. 25-CV-4443

Designated Magistrate Judge
Keri L. Holleb Hotaling

**TRANSFER OF CASE TO THE EXECUTIVE COMMITTEE
FOR A REASSIGNMENT**

I request the Executive Committee that the above captioned case be reassigned by lot to another judge of this Court. The reasons for my request are indicated on the bottom of this form.



Judge Thomas M. Durkin

Date: Thursday, March 19, 2026

- 28:294(b) I transfer this case to the Executive Committee for reassignment to another judge pursuant to the provisions of 28 USC 294(b). The receiving judge will receive equalization credit.

Dated: Thursday, March 19, 2026

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.8 (rev. 1.8.5)
Eastern Division**

Raymond E. Butler II

Plaintiff,

v.

Case No.: 1:25-cv-04443

Honorable April M. Perry

Eli Jackfinn Eddi, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Thursday, March 19, 2026:

MINUTE entry before the Executive Committee: Case reassigned to the Honorable April M. Perry for all further proceedings pursuant to Local Rule 28 USC 294(b). Mailed notice (emc,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.8 (rev. 1.8.5)
Eastern Division**

Raymond E. Butler II

Plaintiff,

v.

Case No.: 1:25–cv–04443

Honorable April M. Perry

Eli Jackfinn Eddi, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Sunday, March 29, 2026:

MINUTE entry before the Honorable April M. Perry: Plaintiff's motion for reassignment pursuant to Local Rule 40.4 [242] will be heard on 4/9/2026 at 10:00 a.m. in person in Courtroom 1725. Plaintiff should note that if the Court deems the actions related, only Judge Perry (the judge with the lowest–numbered case) can take both actions pursuant to the explicit terms of Local Rule 40.4. Plaintiff should file a withdrawal of the motion by 4/7/2026 to the extent Plaintiff's motion was premised on the assumption that Judge Valderrama would receive both cases. Mailed notice. (jcc,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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EXHIBIT B

AMERICAN BAR ASSOCIATION

STANDING COMMITTEE ON ETHICS AND PROFESSIONAL RESPONSIBILITY

Formal Opinion 522

April 8, 2026

Lawyer's Obligation to Disclose Information About Grounds for a Judge's Disqualification

ABA Model Rule of Professional Conduct 8.4(d) prohibits a lawyer from engaging in conduct that is prejudicial to the administration of justice. When a lawyer in a proceeding possesses information that the lawyer knows is reasonably likely to give rise to a judicial disqualification obligation, Rule 8.4(d) requires the lawyer, as an officer of the court, to disclose that information to the tribunal. When the lawyer possesses the information only because it is "information relating to the representation of a client," then the lawyer's disclosure obligation is subject to the lawyer's duty of confidentiality under Model Rule of Professional Conduct 1.6.

I. Introduction

ABA Model Code of Judicial Conduct ("MCJC") Rule 2.11 outlines circumstances that require judges to recuse themselves from proceedings. Rule 2.11(a) begins by setting forth the general recusal standard: "A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned . . ." It then provides a nonexclusive list of circumstances in which judges must be recused, subject in certain circumstances to the parties' waiver of disqualification.¹ Among the kinds of circumstances that may call for a judge's recusal are familial and significant personal relationships with parties or lawyers in an action, economic interests implicated by the action, and extrajudicial knowledge of or involvement in the events underlying the action.²

Judges are expected to raise recusal questions themselves, as they best know the relevant information. Comment [5] to Rule 2.11 instructs judges to "disclose on the record information that the judge believes the parties or their lawyers might reasonably consider relevant to a possible motion for disqualification, even if the judge believes there is no basis for disqualification." Comment [2] explains that "[a] judge's obligation not to hear or decide matters in which disqualification is required applies regardless of whether a motion to disqualify is filed."

This Opinion addresses lawyers' obligations under the ABA Model Rules of Professional Conduct ("Model Rules") when the lawyer represents a client in a matter before the tribunal and a judge fails to raise the possibility of recusal, but the lawyer knows information establishing that the judge

¹ MODEL CODE OF JUDICIAL CONDUCT 2.11(A)(1)-(6). Comment [1] to Model Code of Judicial Conduct Rule 2.11 explains: "Under this Rule, a judge is disqualified whenever the judge's impartiality might reasonably be questioned, regardless of whether any of the specific provisions of paragraphs (A)(1) through (6) apply. In many jurisdictions, the term 'recusal' is used interchangeably with the term 'disqualification.'"

² Although the rule itself does not contain expansive guidance on the types of relationships that may be perceived to compromise a judge's impartiality, judicial decisions and ethics opinions collectively give considerable guidance to lawyers who learn information that may be relevant to a judge's analysis on issues related to recusal and disqualification. For example, ABA Formal Opinion 488 examines three categories of relationships between judges and lawyers or parties: (1) acquaintances, (2) friendships, and (3) close personal relationships.

must consider recusal because of the possibility that the judge's impartiality might reasonably be questioned.³ This Opinion is limited to lawyers' ethical obligations under the Model Rules of Professional Conduct and does not address substantive recusal law or standards governing judges' disqualification obligations under the Model Code of Judicial Conduct.

II. Subject to the duty of confidentiality, Model Rule 8.4(d) requires a lawyer who knows information that is reasonably likely to give rise to a judicial recusal obligation to disclose that information to the tribunal.

Outside of ex parte proceedings, lawyers have no duty under the Model Rules to inform the tribunal of all material facts necessary to make informed judicial decisions.⁴ However, in certain circumstances lawyers in judicial proceedings have a limited duty to disclose procedural or jurisdictional information, as distinct from evidentiary information. Although the obligation originates in judicial decisions, a failure to comply with the obligation may be the basis for professional discipline under Model Rule 8.4(d).

A. The Lawyer's Role as an Officer of the Court

Judicial decisions recognize that, as officers of the court, lawyers have an "overarching duty of candor to the Court,"⁵ which requires certain disclosures of important procedural or jurisdictional information, even though no rule or law expressly requires such disclosure.⁶ For example, in *Tiverton Board of License Commissioners v. Pastore*, 469 U.S. 238 (1985), the United States Supreme Court found that a party's lawyer was obligated to disclose that the party had gone out of business because that information made the case moot. The Court stated: "It is appropriate to remind counsel that they have a 'continuing duty to inform the Court of any development which may conceivably affect the outcome' of the litigation." *Id.* at 240.

Other judicial decisions have similarly recognized that lawyers must disclose circumstances and events with important procedural significance. These circumstances have included procedural deficiencies that, if unaddressed, could result in the denial of a fair trial and the reversal of a conviction.⁷ These also include filings and decisions in other jurisdictions that may strip the court of jurisdiction, make further work by the court unnecessary, or be important to the scheduling of a

³ The Model Rules define knowledge as "actual knowledge of the fact in question. A person's knowledge may be inferred from circumstances." MODEL RULES OF PROF'L CONDUCT R. 1.0(f). Knowledge in the Model Rules means more than a mere possibility or suspicion.

⁴ In an ex parte proceeding, Model Rule 3.3(d) requires a lawyer to "inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse." That is because in an ex parte proceeding "there is no balance of presentation by opposing advocates"; therefore, to enable the court to achieve "a substantially just result," which is the object of the proceeding, "[t]he lawyer for the represented party has the correlative duty to make disclosures of material facts known to the lawyer and that the lawyer reasonably believes are necessary to an informed decision." MODEL RULES OF PROF'L CONDUCT R. 3.3, cmt. [14].

⁵ *Eagan by Keith v. Jackson*, 855 F. Supp. 765, 790 (E.D. Pa. 1994).

⁶ The Committee recognizes that there are variations among jurisdictions on how disclosure would occur. Nothing in this opinion is intended to supersede jurisdiction-specific authorities on that issue.

⁷ *See, e.g., Holloway v. Arkansas*, 435 U.S. 475, 485-86 (1978) ("[Criminal] defense attorneys have the obligation, upon discovering a conflict of interests, to advise the court at once of the problem.").

case.⁸

In some circumstances, knowing nondisclosure will be prejudicial to the administration of justice because, for example, the judge is unaware that the court lacks jurisdiction to continue the proceedings, the court would be committing a procedural error that jeopardizes the fairness of the proceedings, or the proceedings are procedurally deficient in some other legal respect.

For example, in ABA Formal Op. 280 (1949), which predates the ABA's adoption of the Model Code of Professional Responsibility, this Committee determined that, "An attorney should advise the court of decisions adverse to his case which opposing counsel has not raised if the decision is one which the court should clearly consider in deciding the case, if the judge might consider himself misled by the attorney's silence, or if a reasonable judge would consider an attorney who advanced a proposition contrary to the undisclosed opinion lacking in candor and fairness to him." This determination arose out of lawyers' duty, as officers of the court, "to aid the court in the due administration of justice" and their duties of "candor and fairness."⁹

To give another example, ABA Informal Op. 1169 (1970) concluded that it would be impermissibly deceptive and prejudicial to the administration of justice for the civil defendant's lawyer to fail to disclose the defendant's death. The Committee reaffirmed that conclusion in Formal Op. 95-397 (1995).¹⁰ The Committee's 1995 opinion relied on *Virzi v. Grand Trunk Warehouse & Cold Storage Co.*, 571 F. Supp. 507 (E.D. Mich. 1983), which found that the plaintiff's lawyer in a personal injury action had a duty to disclose the client's death to opposing counsel and the court. The ethics opinion quoted the District Court's opinion extensively and with approval, including the court's observation that, "Although each lawyer has a duty to contend, with zeal, for the rights of his client, he also owes an affirmative duty of candor and frankness to the Court and to opposing counsel when such a major event as the death of the plaintiff has taken place." *Virzi, supra*, 571 F. Supp. at 512.

In other contexts, this Committee has long reached conclusions that accord with the judicial decisions on lawyers' duty of candor to the tribunal. Although the Committee's opinions offer

⁸ See, e.g., *Cleveland Hair Clinic, Inc. v. Puig*, 200 F.3d 1063, 1067-68 (7th Cir. 2000) (plaintiff's counsel had an obligation to disclose a parallel state lawsuit, because its "goal . . . was to cut off the federal court at the pass, a development that surely could have affected the outcome of the litigation pending in federal court"); *In re Jones*, 231 B.R. 110 (Bankr. Ct., N.D. Ga. 1999) (failure to disclose parallel bankruptcy filing was impermissibly deceitful and prejudicial to the administration of justice).

⁹ This obligation was later codified in Disciplinary Rule 7-106(B)(1) of the Model Code of Professional Responsibility, and it is currently codified in Model Rule 3.3(a)(2), which provides that: "A lawyer shall not knowingly . . . fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel." Model Rule 3.3(a)(2) can be understood as a reminder that the role of an advocate is not purely partisan but also carries a responsibility to protect the integrity of the judicial process itself. Much like a referee in a game depends on players to play by the rules in order for the match to be fair, courts depend on lawyers to surface controlling adverse legal authority—even when it undermines their client's position—so the court can make a fully informed decision. The lawyer's ethical responsibility under Rule 3.3(a)(2) is not merely about avoiding falsehoods but is about actively ensuring the fairness, accuracy, and legitimacy of proceedings, even at the expense of short-term client advantage.

¹⁰ The Committee relied on Model Rule 3.3(a)(1), which addresses the duty to avoid knowingly making false statements to the tribunal and omissions that are the equivalent. The Committee's 1995 Opinion did not call into question the earlier conclusion that failing to disclose the party's death is prejudicial to the administration of justice.

various explanations and cite various rules, the unifying theme is that lawyers must be forthcoming with procedural information that the tribunal needs to ensure that the proceedings are fair.¹¹

In contrast, there is ordinarily no such disclosure duty under the Model Rules when the procedural information in question does not call the court's jurisdiction into question and is not otherwise important to the fair administration of justice. ABA Formal Op. 94-387 (1994) concluded that a plaintiff's lawyer has no obligation to disclose that the statute of limitations has run on the plaintiff's claim. The opinion explained: "The running of the period provided for enforcement of a civil claim creates an affirmative defense which must be asserted by the opposing party, and is not a bar to a court's jurisdiction over the matter. A time-barred claim may still be enforced by a court, and it will be if the opposing party raises no objection."¹²

B. The Source of the Lawyer's Knowledge

Lawyers may obtain actual knowledge about a judge's need to consider recusal from a range of sources. Some of these sources may include "information relating to the representation of the client," but there could be other sources of the lawyer's knowledge.

Illustration 1: Prior Employment Connection

A prosecutor is assigned to represent the state in post-conviction proceedings. The assigned judge previously served as a supervisor in the prosecutor's office. The prosecutor learns from the file that, while working in the prosecutor's office, the judge supervised the trial prosecutor in the case. The defendant's lawyer is evidently unaware of the judge's supervisory responsibility for an earlier stage of the case, and the judge may not recall it.

Illustration 2: Campaign Contribution

A lawyer representing a party in a civil case learns from the client that the client was a major financial supporter of the presiding judge's recent judicial election campaign. The client acknowledges having made a significant contribution to a political action committee earmarked for the judge's campaign, but there is no public record of the contribution, and it is uncertain whether the judge knows of it.

¹¹ See ABA Comm. on Ethics & Pro. Resp., Formal Op. 96-404 (1996) (a lawyer seeking appointment of a guardian for a client must disclose the lawyer's expectation of being retained by the guardian to provide future legal services); ABA Comm. on Ethics & Pro. Resp., Informal Op. 1386 (1977) (a lawyer must disclose to opposing counsel and the court that the client has entered into a "Mary Carter Agreement," under which the amount of the defendant's liability will decrease as another defendant's liability increases); ABA Comm. on Pro. Ethics & Grievances, Formal Op. 17 (1930) (if a party's lawyer moves for substitution of counsel without notice to the party's prior counsel, it would violate the duty of candor to the court to fail to disclose that notice was not given).

¹² See also ABA Comm. on Ethics & Pro. Resp., Formal Op. 07-446 (2007) (a lawyer need not disclose the provision of assistance to a pro se litigant, because the court is unlikely to be misled or to provide unfair assistance). *But see* Duran v. Caris, 238 F.3d 1268 (10th Cir. 2001) (lawyer's failure to disclose the provision of substantial assistance in drafting a pro se litigant's brief is impermissible deceit and conduct prejudicial to the administration of justice).

Illustration 3: Spouse's Law Firm Involvement

A lawyer learns that co-counsel for another party in a consolidated civil action has engaged the judge's spouse's law firm for related consulting work on discovery strategy. The lawyer knows of this fact because an associate from the spouse's firm copied the lawyer on an email exchange related to scheduling depositions.

Illustration 4: Counsel's Business Relationship with Judge's Family Member

A lawyer for a party in a civil action recently became a minority shareholder in a local business. The lawyer knows that the judge's adult child is an executive and major investor in the business.

In each of these illustrations, the lawyer possesses actual knowledge of facts that may reasonably require the judge to consider recusal. Whether Model Rule 8.4(d) requires the lawyer to make a disclosure depends on whether (a) the information is reasonably likely to require recusal and (b) the disclosure can be made without violating the lawyer's confidentiality obligations under Model Rule 1.6 or Model Rule 1.9.

C. Limits on the Lawyer's Obligation to Disclose

Candor to the tribunal imposes obligations beyond what the Model Rules alone enumerate. As discussed above, courts may—and often do—require lawyers to disclose jurisdictional or procedural information essential to just adjudication. While the Model Rules codify some specific disclosure requirements, they deliberately leave room for courts to define others, and failure to meet those judicially recognized duties can amount to conduct prejudicial to justice. Information that is reasonably likely to give rise to a judicial recusal obligation, if not raised by the judge, is the sort of information that a lawyer must disclose to ensure procedural fairness.¹³ The failure to make this disclosure constitutes conduct prejudicial to the administration of justice under Model Rule 8.4(d).¹⁴ Unlike information relevant to an affirmative defense based on the statute of limitations, information that is reasonably likely to require a judge's recusal is important for the judge to consider, and, unless the judge recuses, to share with the parties. Otherwise, the judge's failure to recuse may deny the parties a fair trial and constitute the kind of procedural error that necessitates overturning the result of the proceeding.

As in the situation addressed by Model Rule 3.3(a)(2)—which requires a lawyer to disclose to the tribunal legal authority in the controlling jurisdiction that is both directly adverse to the lawyer's client and not disclosed by opposing counsel—the underlying concern is about the structural integrity of the proceedings. If the lawyer knows there is a procedural flaw in the proceedings that goes to their fairness and integrity—in this case, the judge's failure to consider the recusal obligation—the lawyer must rectify that procedural deficiency.

¹³ See *In re Bernard v. Coyne*, 31 F.3d 842, 847 (9th Cir. 1994) (“Counsel for a party who believes a judge’s impartiality is reasonably subject to question has not only a professional duty to his client to raise the matter, but an independent responsibility as an officer of the court.”).

¹⁴ Cf. State Bar of Michigan, Opinions JI-79 (1994) and J-6 (1996) (concluding, based on Michigan’s Rule of Professional Conduct 8.4, that when a judge fails to disclose facts that would require the judge’s recusal, a party’s lawyer who knows the facts must disclose them).

This is not the kind of evidentiary information relating to the court's rulings that one may leave to the opposing party to uncover; nor may a party fairly exploit the opposing party's lack of diligence in failing to uncover this sort of information. Parties have no reason to investigate the judge's financial and familial relationships and other circumstances in search of facts that may call for a judge's recusal. As noted, that is principally the judge's responsibility. But when the judge fails to make the requisite disclosure and that failure could result in a serious procedural deficiency that jeopardizes the justness of the proceedings, the judge's nondisclosure must be corrected by a lawyer who knows the relevant information.

The obligation to disclose information requiring a judge's recusal should take account of a lawyer's duty of confidentiality. Model Rule 8.3, which requires lawyers to report certain serious judicial misconduct as well as certain serious misconduct by lawyers, provides that these reporting obligations are limited by the duty of confidentiality under Model Rule 1.6.¹⁵ Although clients should generally be encouraged to give informed consent to their lawyer's reporting judicial misconduct pursuant to Model Rule 8.3(c), a lawyer may not disclose information relating to the representation without the client's informed consent unless there is an applicable exception to the confidentiality obligation. We conclude that the lawyer's duty to disclose a judge's possible recusal obligation is subject to the same limitation.

As this Committee recently discussed in ABA Formal Opinion 519 (2025), which addressed lawyers' disclosures in motions to withdraw from a representation, various provisions of the Model Rules may require or permit lawyers to disclose information relating to the representation to the court. When a lawyer knows information that is reasonably likely to give rise to a judicial disqualification obligation, either of two provisions may apply.

First, Model Rule 1.6(b)(6) permits a lawyer to "reveal information relating to the representation of a client to the extent the lawyer reasonably believes necessary . . . to comply with other law." As discussed above, judicial decisions recognize that, in some circumstances, lawyers' duty of candor to the court requires lawyers in judicial proceedings to disclose jurisdictional or procedural information relating to the representation. Insofar as the judicial decisions of the relevant jurisdiction extend this disclosure obligation to information regarding judicial recusal, Model Rule 1.6(b)(6) would permit disclosure to comply with other law.

Second, Model Rule 3.3(b) provides: "A lawyer who represents a client in an adjudicative proceeding and who knows that a person intends to engage, is engaging or has engaged in criminal or fraudulent conduct related to the proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal." In some situations, such as when a client has an undisclosed personal, professional, or business relationship with the judge that is likely to require judicial recusal, the client's intent to exploit—rather than disclose—the relationship may amount to "fraudulent conduct related to the proceeding."¹⁶ When the lawyer knows that the client plans to proceed without disclosure in order to secure an improper advantage, withdrawal alone will often be insufficient as a remedial measure. In those circumstances, the lawyer may be required to

¹⁵ Model Rule 8.3(c) provides that the reporting obligation "does not require disclosure of information otherwise protected by Rule 1.6." Comment [2] to Rule 8.3 further clarifies: "A report about misconduct is not required where it would involve violation of Rule 1.6."

¹⁶ MODEL RULES OF PROF'L CONDUCT R. 3.3(b) & R. 3.3, cmt. [12].

disclose the grounds for recusal or take other reasonably available steps necessary to prevent or rectify the client's fraudulent conduct. Needless to say, the lawyer may not assist in a client's fraudulent conduct. *See* Model Rule 1.2(d) & 1.16(a)(4).

Absent the client's informed consent or an applicable exception to the duty of confidentiality, however, we conclude that the duty to disclose information reasonably likely to require recusal is subject to the duty of confidentiality under Model Rule 1.6(a) when that information is "relating to the representation of a client."

III. Where Should the Lawyer Disclose the Information?

The lawyer should disclose information that is reasonably likely to require recusal to an authority capable of addressing that issue. In most instances, the lawyer may appropriately begin by disclosing the information directly to the judge, with notice to opposing counsel.¹⁷ In other cases, disclosure to the chief judge or other designated administrative authority may be warranted, depending on the nature of the potential conflict.

It is important to remember that for many potential disqualification concerns, the judge would ordinarily be aware of sufficient information to recognize the need to engage in a disqualification analysis. Yet recent years have seen numerous reported instances in which judges failed to recuse when the circumstances warranted it. Lawyers, as officers of the court, should not only disclose information reasonably likely to require recusal that a judge may not be aware of, but also should not remain silent and allow a judge to knowingly refuse to acknowledge circumstances requiring recusal. Regardless of whether judges fail to meet their own ethical obligations, lawyers' obligations as officers of the court also require lawyers to do what they can to remedy the situation.

There can also be circumstances where a judge may not recognize the basis for disqualification as a result of procedural error or misunderstanding rather than volitional disregard of ethical duties. Judges are not infallible, and the disqualification provisions of MCJC Rule 2.11 can be complex in their application. For example, a judge might know that she owns stock in Alpha Corporation but not realize that Alpha is the parent company of Beta Corporation, a named party in the case, and thus fail to consider disqualification. If that information is reasonably likely to require the judge's recusal, the lawyer should alert the judge to the issue so that the judge can determine whether recusal or disclosure is warranted. In this way, the lawyer helps to safeguard the fairness and integrity of the proceeding, ensuring that inadvertent judicial oversights do not compromise public confidence in the impartial administration of justice.

As noted above, ABA Model Rule of Professional Conduct 8.3(b) specifically addresses lawyers' obligation to disclose judicial misconduct in certain circumstances and requires the lawyer to "inform the appropriate authority."¹⁸ Model Rule 8.3(b) will rarely require a lawyer to report a

¹⁷ The opposing party should be notified to avoid the risk of an improper ex parte communication between a lawyer and the judge.

¹⁸ Model Rule 8.3(b) provides that: "A lawyer who knows that a judge has committed a violation of applicable rules of judicial conduct that raises a substantial question as to the judge's fitness for office shall inform the appropriate authority." Comment [3] explains: "The term 'substantial' refers to the seriousness of the possible offense and not the quantum of evidence of which the lawyer is aware."

judge's failure to recuse as required by MCJC 2.11. The lawyer must disclose only if the lawyer personally *knows* (not merely suspects) each of three things: (1) that the judge had a recusal obligation under the MCJC Rule 2.11; (2) that the judge failed to comply with that obligation; and (3) that the judge's failure to recuse raises a substantial question as to the judge's fitness for office.¹⁹ Ordinarily, a judge's failure to recuse will not raise a substantial question about the judge's fitness for office unless the obligation to recuse is obvious and the judge is utterly indifferent to the obligation, so that the judge's recusal violation seriously erodes public confidence in the judge's fairness and commitment to ethical compliance in general, not just in the particular case.²⁰ A judge's failure to consider recusal in circumstances where the obligation to recuse is uncertain would not implicate Model Rule 8.3(b), because the failure to consider recusal in such circumstances would not "raise[] a substantial question as to the judge's fitness for office." Consequently, a reporting obligation will likely arise only if the facts necessitating the judge's recusal were called to the judge's attention during the case or it is otherwise obvious that the judge was aware of the relevant facts and deliberately disregarded their significance.

IV. Conclusion

When a lawyer in a proceeding possesses information that the lawyer knows is reasonably likely to give rise to a judicial disqualification obligation, Model Rule 8.4(d) requires the lawyer, as an officer of the court, to disclose that information to the tribunal. When the lawyer possesses the information only because it is "information relating to the representation of a client" then the lawyer's disclosure obligation is subject to the duty of confidentiality under Model Rule 1.6.

AMERICAN BAR ASSOCIATION STANDING COMMITTEE ON ETHICS AND PROFESSIONAL RESPONSIBILITY

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¹⁹ See note 3, *supra*; see also Hon. Deborah L. Thorne et al., *Protecting the Integrity of the Profession*, 43-JUN AM. BANKR. INST. J. 24, 24 n.5 (2024) (citing *Mont. Merch. Inc. v. Dave's Killer Bread Inc.*, No. CV-17-26-GF-BMM, 2017 WL 4246899, at *5 (D. Mont. Sep. 25, 2017)); S.C. Bar Ethics Advisory Committee, Advisory Op. 05-04 (2005) ("Rule 8.3 requires actual knowledge of, or believing clearly that there has been a violation, which implies more than a suspicion of misconduct."). In ascertaining whether a lawyer has the requisite knowledge, the information of other lawyers in the lawyer's firm or of co-counsel is not "imputed" to the lawyer in question if they have not shared the information, and likewise, a lawyer's information is not "imputed" to other lawyers or to the lawyer's firm if the lawyer has not shared the information.

²⁰ *Cf.* Me. Board of Overseers of the Bar Op. 227, *Required Reporting M.R. Prof. Conduct 8.3* (2025) (explaining that lawyers must report if they know (or reasonably infer) that another attorney engaged in misconduct violating the Rules, creating a "substantial question" about that attorney's honesty, trustworthiness, or fitness to practice).

EXHIBIT C

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

RAYMOND E. BUTLER, II,) Case No. 25 CV 4443
)
Plaintiff,)
)
v.)
)
ELI JACKFINN EDDI, et al.,)
) Chicago, Illinois
Defendants.) April 9, 2026
) 10:00 a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE APRIL M. PERRY

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* * * * *

25 PROCEEDINGS REPORTED BY STENOTYPE
TRANSCRIPT PRODUCED USING COMPUTER-AIDED TRANSCRIPTION

1 (Proceedings heard in open court:)

2 THE CLERK: Calling case 25 CV 4443, Butler versus
3 Eddi.

4 THE COURT: All right. Just line up and share the
5 microphones as best you can.

6 MS. LONDON: Good morning, Your Honor. Katherine
7 London on behalf of the plaintiff, Raymond Butler.

8 THE COURT: Good morning.

9 MS. ROSEN: Sue Ann Rosen from Ashman Stein on behalf
10 of Eric Rothner.

11 MS. MAHER: Good morning. Robin Maher on behalf of
12 Ilana Eddi.

13 MR. MANDEL: Alan Mandel on behalf of Nachshon
14 Draiman.

15 MS. PEARCE: Jackie Pearce on behalf of Irving
16 Birnbaum.

17 MR. WEINTRAUB: Gary Weintraub on behalf of Stanton,
18 Aron.

19 MS. ZUBA: Samantha Zuba on behalf of Menachem Shabat,
20 Chaim Rajchenbach and Shmuel Fuerst.

21 MS. WELLER: Jennifer Weller on behalf of Jeffrey
22 Gutman.

23 MR. OBERTS: Your Honor, good morning. Bill Oberts,
24 O-B-E-R-T-S, on behalf of Colman Ginsparg.

25 MS. GREEN: Meredith Green on behalf of William

1 Kanter.

2 MS. CURRY: Mary Kathryn Curry on behalf of David
3 Raanan.

4 MR. HALL: Good morning, Your Honor. I'm Thomas Hall.
5 I represent Manuel and Dorine Magence.

6 MR. FRENCH: Good morning, Your Honor. Thomas French
7 on behalf of Mr. Harold Katz.

8 MR. BORCIA: Jim Borcia for Garry Chankin.

9 THE COURT: Is that everyone? All right. Good. I
10 appreciate you all being here in person. It is not my policy
11 to drag people in for nonsubstantive motions. Hopefully we can
12 accomplish most of what needs to be done on papers. But to the
13 extent we are going to be talking about substantive motions, it
14 is my policy to have everyone appear in person. I know some of
15 you are from out of town. So you can have, on the defense
16 side, to the extent there are no conflicts, you can obviously
17 step up on each other's behalf. And again, hopefully we won't
18 need to do this too often because I know it is a lot of time
19 and money that people spend. But I find that things go
20 smoother when we all have to look each other in the eye and you
21 all have to look me in the eye, so that is why we are here
22 today.

23 We are up today on plaintiff's motion to disqualify,
24 which is docket entry Number 245. It names five, perhaps six,
25 depending on how you read it, bases for my recusal. We will

1 discuss each one of those in turn.

2 But first, Ms. London, I should tell you, I don't know
3 who all of the people in the courtroom are. But I understand
4 that the Seventh Circuit has opened an ARDC referral regarding
5 similar types of motions to disqualify. I don't know if anyone
6 from the ARDC is here today. It is their practice, if they
7 have an open investigation, frequently to either come or to get
8 transcripts, so you should proceed with the understanding that
9 they may be reading this. In addition, of course, to the
10 understanding that you are an officer of the court always when
11 you appear.

12 So let's talk about each one of these different bases
13 for recusal that you have notated in your motion.

14 The first is my prior professional relationship with
15 Judge Alexakis, who recused herself from the case a short time
16 ago. I should note that not only did we work together before,
17 we work together now and we are friends as I am with many of my
18 colleagues on the bench.

19 This particular case involves trust assets from which
20 the plaintiff claims he's been unfairly denied and which have
21 been dissipated. The claims involve fraud and breach of
22 fiduciary duty by individuals who had involvement with various
23 family trusts in which the plaintiff allegedly had an interest.

24 Put simply, this case has nothing to do with me. It
25 has nothing to do with Judge Alexakis. She is not a victim.

1 She is not a witness. She is not a party. She is not a lawyer
2 in the case. She recused herself because of a different
3 lawsuit, which is noted in her minute order, which named her as
4 well as four other judges as well as the entirety of the Cook
5 County clerk's office as defendants filed by the same
6 plaintiff. That lawsuit takes issue with various rulings that
7 Judge Alexakis and later Judge Maldonado from the Seventh
8 Circuit made.

9 Judge Alexakis noted in her minute order that she did
10 not have to recuse herself from the case because the other
11 lawsuit is frivolous. As should go without saying, if a party
12 could disqualify a judge in their case just by suing them, we
13 would have a whole lot more disqualifications. It would
14 incentivize perversely parties to sue judges indiscriminately
15 to receive more favorable treatment or more favorable judges.
16 And that's the reason the rule exists that a judge doesn't have
17 to recuse themselves on the basis of a frivolous lawsuit.

18 But Judge Alexakis chose to recuse herself on a
19 voluntary basis under the belief that her impartiality might
20 reasonably be questioned. Plaintiff's argument is now because
21 I'm friends with Judge Alexakis, my impartiality might
22 reasonably be questioned because her impartiality might
23 reasonably be questioned.

24 Unfortunately, I do not accept the premise that the
25 conflict rules work like the transitive properties in a math

1 problem. Just because Judge Alexakis has a conflict and I'm
2 friends with Judge Alexakis, does not then mean I have a
3 conflict. And I have not seen any authority in the rules or
4 case law to indicate otherwise.

5 The closest judicial advisory opinion that I'm aware
6 of on this topic is Number 11, which discusses judicial
7 disqualifications when a judge's longtime friend is actually a
8 counsel in the case. Interestingly, even then -- and in that
9 case I think the attorney is not only a friend but the
10 Godfather of the judge's child, even in that case, the judicial
11 advisory opinion did not require disqualification.

12 Here, of course, we are much farther afield because
13 Judge Alexakis is neither a lawyer in the case nor does she
14 have any continued involvement with it at all. In short, her
15 decision to recuse herself has nothing to do with me, and I
16 will not disqualify myself on the basis that I am friends with
17 her.

18 That turns us to the second issue in which the
19 plaintiff and plaintiff's counsel have questioned the validity
20 of my judicial nomination and confirmation. Specifically
21 alleging that an autopen may have been used to sign my
22 commission.

23 So let me ask you first, Ms. London. Do you know what
24 an autopen is and how it works?

25 MS. LONDON: Yes, Your Honor.

1 THE COURT: Okay. What is your understanding of how
2 an autopen works?

3 MS. LONDON: My understanding is that an autopen is
4 used when the president is not able to participate in or be at
5 the signing of something that he would need to sign and an
6 autopen is used in his absence with his knowledge of what is
7 being signed in his absence.

8 THE COURT: All right. My question is actually much
9 more basic. How does an autopen work?

10 MS. LONDON: I believe it's like an electric stamp,
11 but I don't know for sure.

12 THE COURT: All right. So you would agree with me
13 that signatures generated by an autopen are identical?

14 MS. LONDON: Yes, but I would disagree that it is the
15 intent of the person who intends to sign something that is
16 different. Anybody could stamp something with an identical
17 signature, but it's not the same thing as the person who has --
18 owns that signature knowing what is being signed.

19 THE COURT: I just asked you whether autopen
20 signatures are identical.

21 MS. LONDON: I believe they are supposed to be.

22 THE COURT: Right. Because that's how an autopen
23 works, right? They generate identical signatures over and over
24 and over again, correct?

25 MS. LONDON: Sure.

1 THE COURT: Have you seen my judicial commission?

2 MS. LONDON: No.

3 THE COURT: Have you seen any judicial commission
4 signed by President Biden?

5 MS. LONDON: No.

6 THE COURT: So what is your good-faith basis for
7 alleging that an autopen was used with respect to my
8 commission?

9 MS. LONDON: Well, we gave you specific references to
10 whistleblower testimony and the June 4th, 2025, White House
11 memorandum and the ongoing investigations regarding the autopen
12 to substantiate our claim.

13 THE COURT: To be used in some documents that were
14 supposed to be signed by the President?

15 MS. LONDON: Yes.

16 THE COURT: Let me tell you, I have no reason to
17 believe an autopen was used with respect to the signing of my
18 commission. First, I have seen several commissions signed by
19 President Biden. We all have them up in our offices. The
20 signatures are remarkably consistent but they are not
21 identical. Indicating to me no autopen was used.

22 Secondly, at the time I was confirmed, I was told that
23 I needed to state when I would be available for my commission
24 to be signed because the President often requires several times
25 to be able to -- several days to be present to be able to sign

1 the judicial commission. Therefore, we were all told that once
2 we said we were ready for our commission to be signed, we would
3 need to expect that it could take up to a week for our
4 commissions to be signed.

5 Based on the facts within my personal knowledge, there
6 is no infirmity within my appointment process. Speculation and
7 conjectures based upon the Internet or news don't count as
8 facts. If someone in the executive or the legislative branch
9 had a genuine basis to challenge the 200 plus judges who were
10 appointed by the last presidential administration, I can almost
11 guarantee they would have moved forward with official action on
12 that basis.

13 The most recent public reporting I have seen on this
14 is that the Washington D.C. U.S. Attorney's office closed its
15 investigation into the use of autopens based upon a total lack
16 of any factual information to support it. So until someone
17 with actual knowledge of relevant facts provides me with any
18 information to challenge the legitimacy of my appointment, I
19 plan to continue doing the job that the taxpayers have been
20 paying me to do.

21 That brings me to your third basis. Financial
22 disclosure report, which I have not made publicly available.
23 First let me ask you, which financial disclosure report are you
24 complaining about not being publicly available?

25 MS. LONDON: 2024, 2025.

1 THE COURT: Okay. Before you accused me of violating
2 my statutory duty to file that financial report, I'm assuming
3 you looked at the statute. Is that true?

4 MS. LONDON: Yes, I did.

5 THE COURT: What statute did you look at?

6 MS. LONDON: I don't know, Your Honor.

7 THE COURT: The financial disclosures are governed by
8 5 United States Code 13101 through 13111. The United States
9 Code 13103 requires annual reports to be filed by May 15th, the
10 calendar year after the judge is disclosing about. So to the
11 extent you're complaining about my 2025 report not being
12 publicly available to you, I was under no obligation to file it
13 before May 15th. It is April 9th. In case you are wondering,
14 I actually filed it very early in late March. It is currently
15 publicly available to you.

16 To the extent you are complaining about 2024, the
17 statute says that an annual report must be filed for any
18 calendar year in which a judge serves in excess of 60 days.

19 Did you happen to look to see when I started serving
20 on the bench before you accused me of having violated my
21 statutory duty?

22 MS. LONDON: I did, Your Honor. And to your previous
23 point, I did check to see if your financial disclosure was
24 publicly available within the last few days, and I have not
25 been able to find it.

1 THE COURT: Well, someone else has already found it
2 and requested it. So I would suggest that perhaps your
3 searches have been in error because people are downloading it.

4 How many days did I serve in 2024?

5 MS. LONDON: I don't know, Judge.

6 THE COURT: My commission was signed on November 20th.
7 I was sworn in on November 26th. That is fewer than 60 days in
8 the calendar year. I was under no obligation to file a
9 financial report by the statute. Your allegations not only
10 have no factual support, they are frivolous.

11 That moves us to the Vanguard investments. Luckily
12 you were able to access my financial disclosure when I was
13 nominated to the U.S. Attorney, and you were able to discern
14 that along with about 30 million other customers, I have
15 investments at Vanguard. You have argued that I should
16 disqualify myself because apparently the trust in this case is
17 also a Vanguard customer, which I didn't know because Vanguard
18 doesn't appear anywhere in the complaints.

19 The rules regarding disqualification because of
20 financial interest are quite clear. A judge must disqualify
21 herself when she has a financial interest in the subject matter
22 and controversy. Having a bank account at the same place as
23 one of the parties has a bank account, does not even remotely
24 meet the standard. Vanguard is at best maybe a witness in this
25 case to authenticate bank records. It is not a party to the

1 case, and there is no reason to think that any other person's
2 accounts at Vanguard would be in any way affected by the
3 outcome of this particular case. In sum there is no basis for
4 disqualification on that basis.

5 The next stated basis for recusal is my ruling in the
6 *State of Illinois vs. Trump* case, which you have alleged
7 indicates a broad disregard for core constitutional principles.
8 Are you aware of what happened to that ruling on appeal?

9 MS. LONDON: Yes, Your Honor.

10 THE COURT: Do tell.

11 MS. LONDON: I am aware of it.

12 THE COURT: All right. So you're aware that the
13 ruling was upheld by both the Seventh Circuit and the Supreme
14 Court?

15 MS. LONDON: Yes.

16 THE COURT: Given that, no objective observer could
17 reasonably question whether that case reflects a broad
18 disregard for core constitutional principles.

19 Let me ask you next, even if that were untrue, what
20 does this case have to do with core constitutional principles?

21 MS. LONDON: Well, the core constitutional principle
22 that we discussed earlier regarding the autopen ties into the
23 constitutional issues in the Trump case as well. If you're
24 throwing out the autopen, then I don't have anything else to
25 say about it.

1 THE COURT: Okay. Finally you take issue with my
2 local Rule 44 analysis under which I applied the local rule,
3 like I do all statutes, like the Supreme Court has commanded me
4 based upon its plain language. A judge's application of the
5 law or rule as written is hardly a reasonable basis to
6 disqualify the judge. In sum, no reasonable person, knowing
7 all the facts, would conclude my impartiality might reasonably
8 be questioned within the meaning of 28 United States Code
9 Section 455(a).

10 I also want to note that you also bring the motion as
11 under 28 U.S.C. Section 144, which applies when the judge has a
12 personal bias or prejudice against either the filing party or
13 in favor of the adverse party. Your proposed basis for
14 qualification, of course, has nothing to do with either you or
15 the opposing party. They're instead attacks on my judicial
16 nomination, my personal relationships, my financial disclosure,
17 reporting obligations, where I bank, and my prior rulings. So
18 Section 144 is just inapplicable to the case. Other than to
19 say when you had your client swear under oath that all of the
20 facts in the motion were true, you put your client at risk for
21 either prosecution for making a false statement or certainly
22 for further cross-examination regarding his factual bases for
23 any of these things. Enough said about that.

24 To be clear, your motion]fails under even the most
25 lenient view of your obligations under Rule 11. You didn't do

1 the most basic factual research about what my financial
2 disclosure reporting requirements are before accusing me of
3 having violated them. You have no legitimate basis to argue
4 under the law that I should disqualify myself because I use a
5 bank where the assets in the case are held or that an opinion
6 upheld by the Supreme Court represents a disregard for the
7 Constitution or that following the plain language of the local
8 rules is an entitlement to disqualification.

9 This is your one free pass. I do not like sanctioning
10 attorneys. I think it distracts us from the actual issues in
11 the case, and I think it is highly inefficient. But I will not
12 tolerate any additional frivolous motions. You will be
13 sanctioned, just as the Seventh Circuit has already sanctioned
14 you, if you persist in this type of behavior. You didn't get
15 any warning from the Seventh Circuit; you are getting one from
16 me. You are also doing your client no favors when you delay
17 litigation with motions like this.

18 So let's move on to the actual issues in this case
19 that matter. There are several pending motions at various
20 stages in briefing. Giving my statements about Rule 11, which
21 I want everybody to take note of, I want to give everyone the
22 chance to think very hard about the motions they filed and
23 whether or not they intend to persist with them. My skim of
24 the document, which is quite long, indicates there may be
25 similar issues lurking. So I want to give anybody a chance to

1 withdraw any motions that they think should be withdrawn.

2 I'm going to ask you all to meet and confer. I know
3 there's a lot of you, so I know that probably is quite
4 complicated. But I want you to meet and confer about the
5 pending motions, whether you intend to persist with them if you
6 have been the one who filed them, and whether you do intend to
7 persist with them, what a proposed briefing schedule would be
8 for each of them.

9 So I'm going to ask for a joint proposed status --
10 joint status report by April 24th. If you all can't agree,
11 because again, there are many, many of you, you can each submit
12 a status report of no more than three pages regarding the
13 pending motions. To the extent you are the one who filed the
14 motion, please just let me know if you are going to withdraw it
15 or persist in it and what a proposed briefing schedule would be
16 for those.

17 I'm aware from the docket that Judge Alexakis did not
18 move forward on these at her discretion to manage her docket.
19 I intend to move forward with any and all ancillary motions
20 either that have been filed or will be filed, as I am entitled
21 to do, while we wait for the Seventh Circuit's ruling on the
22 other issues just so we can get rid of those and keep this case
23 moving forward as best we can.

24 Do you have any questions, Ms. London?

25 MS. LONDON: No, Your Honor.

1 THE COURT: Any questions on this side of the
2 courtroom?

3 MS. ROSEN: Your Honor, my client was served and two
4 days after the service, there was a stay put on the case. We
5 will file a motion to dismiss. I have one prepared, but I
6 didn't file it because there has been a stay.

7 THE COURT: Right.

8 MS. ROSEN: Should I file it?

9 THE COURT: I will take a look at that. I mean, to
10 the extent that you all agree to lift the stay -- my
11 understanding of what is on appeal, and correct me if I'm
12 wrong, because I have not dug super deep into this docket, is
13 that it's a TRO that's under appeal?

14 MS. LONDON: An injunction.

15 THE COURT: Okay. So I don't think the stay is
16 mandatory in this case. I also seem to recall though that the
17 stay was put in place because of a pending Cook County action.
18 So it may still be in the interest of efficiency and such to
19 keep it in place. If you all agree it should be lifted, let me
20 know. If there are people who want to lift it and people who
21 don't, let me know that and we can discuss whether or not that
22 should be briefed.

23 MR. MANDEL: Very briefly, Your Honor, the order was
24 that none of the defendants should seek to respond to the
25 complaint until, amongst other things, there was a

1 determination in the state court as to whether or not
2 Mr. Butler was an appropriate heir or beneficiary to the trust.
3 While we were here, I looked at the docket in the Circuit
4 Court, that case is still pending. There was a motion to
5 disqualify the judge who was supposed to try the case in
6 November. There are proceedings, I believe, next week with
7 respect to that case. In the interest of judicial economy, I
8 think we should wait before we start filing our motions until
9 we find out if there's a basis for the case.

10 THE COURT: Understood. That's what the point of the
11 status report is. So I don't want to sit here and have all
12 20 or some odd of you tell me your position on the record, it
13 will get too confusing. The stay remains in place for now. No
14 one has to file anything. Tell me if you all agree to remove
15 it or to get rid of the stay, although it sounds like you do
16 not. It might be helpful, if anyone can guess, which you may
17 not be able to, how long the state case will take to resolve.
18 But that, of course, depends on how many other motions have
19 been filed in the meantime.

20 MS. MAHER: Your Honor, I am the attorney for the
21 defendants in the state case, and can speak to it if you're
22 interested or I can put it in a status report; but there have
23 been a number of motions that I would call frivolous including
24 to disqualify the current judge who has now been named as a
25 potential party or seeking leave to sue him in the cause of

1 action against the federal court judges. We have a hearing
2 scheduled with an assigned judge -- the way Cook County works,
3 a different judge decides recusal motions, disqualification
4 motions. We have a hearing on April 24th in that matter.

5 THE COURT: Maybe it makes sense to kick our date a
6 little bit longer then.

7 MS. MAHER: Yeah. At that point we will potentially
8 know at least who our judge is. But we are a ways off from
9 resolving that case given the number of frivolous motions that
10 have been filed in the meantime.

11 THE COURT: All right. So you at least think you'll
12 know whether you'll be sitting under the same judge or a
13 different judge by the 24thish?

14 MS. MAHER: I believe so. I hope so.

15 THE COURT: All right. Let me give you then until --
16 let's do May 5th for your status reports. Anything that's
17 agreed goes up front to the status report. To the extent you
18 all have supplemental submissions, no more than three pages
19 each please, and to the extent you agree in small combinations
20 of people, you can combine those. All right?

21 MS. MAHER: Very good.

22 THE COURT: Thank you all.

23 (Concluded at 10:26 a.m.)

24 * * * * *

25

1 I certify that the foregoing is a correct transcript from the
2 record of proceedings in the above-entitled matter.

3

4 /s/Noreen E. Resendez
5 Noreen E. Resendez, CSR, RPR, CRR
6 Official Court Reporter

April 13, 2026
Date

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EXHIBIT D



Katherine London <klondon@kmflaw.com>

Re: Transcript Order Number 55084, Butler vs. Eddi, et al

NoreenOfficialTranscripts <noreenofficialtranscripts@gmail.com>

Mon, Apr 13, 2026 at 9:24 AM

To: Katherine London <klondon@kmflaw.com>

Good morning,

Attached is the requested transcript of proceedings. I overestimated the total pages from that morning. You have a \$33.00 refund due. May I refund via Zelle or would you like a check mailed to your office?

Thank you,

On Thu, Apr 9, 2026 at 4:52 PM Katherine London <klondon@kmflaw.com> wrote:

Thank you! I just sent a Zelle payment.

Kate

**Katherine A. London** **KMFL Law**

(630) 507-9998

KLondon@KMFLLaw.com

IL ARDC # 6345920

TN BPR # 042941

On Apr 9, 2026, at 4:24 PM, NoreenOfficialTranscripts <noreenofficialtranscripts@gmail.com> wrote:

Good Day,

Thank you for your recent transcript order, #**55084**, in re the above-referenced case.

Attached is the associated invoice. Kindly remit payment so as the transcript may be forwarded to you in the requested time frame.

You may remit payment via check to the address listed on the invoice or via Zelle to: noreen@perscriboreporting.com.

Please Note: Transcription begins on the date payment is received.

Noreen Resendez CSR, RPR, CRR

Official Court Reporter

Hon. April M. Perry

Northern District of Illinois

219 South Dearborn Street

Room 1728

Chicago, IL 60604

(312) 582-5267

noreen_resendez@ilnd.uscourts.gov

<Invoice 20260188.pdf>

<PRI W-9 2024.pdf>



25CV4443 04_09_26.pdf

120K



Katherine London <klondon@kmflaw.com>

Re: Transcript Order Number 55084, Butler vs. Eddi, et al

1 message

Katherine London <klondon@kmflaw.com>

Tue, Apr 14, 2026 at 12:38 PM

To: NoreenOfficialTranscripts <noreenofficialtranscripts@gmail.com>

Cc: Raymond Butler II <RaymondEButler@protonmail.com>

Good Afternoon,

I am reading through the transcript from April 9, 2026 in case 1:25-cv-4443 and I have contemporaneous notes that state Ms. Rosen said she was planning to file an answer. Not a motion to dismiss (p17 lines 1-5). Would you please check her statement against the court recording? I just need to confirm exactly what she stated.

Thank you,

K

**Katherine A. London** **KMFL Law**

(630) 507-9998

KLondon@KMFLLaw.com

IL ARDC # 6345920

TN BPR # 042941

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Kate

**Katherine A. London** **KMFL Law**

(630) 507-9998

KLondon@KMFLLaw.com

IL ARDC # 6345920

TN BPR # 042941

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Good Day,

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You may remit payment via check to the address listed on the invoice or via Zelle to: noreen@perscriboreporting.com.

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Noreen Resendez CSR, RPR, CRR

Official Court Reporter

Hon. April M. Perry

U.S. District Court

Northern District of Illinois

219 South Dearborn Street

Room 1728

Chicago, IL 60604

(312) 582-5267

noreen_resendez@ilnd.uscourts.gov

<Invoice 20260188.pdf>

<PRI W-9 2024.pdf>



Katherine London <klondon@kmflaw.com>

Transcript 1:25-cv-04443

1 message

Katherine London <klondon@kmflaw.com>

Thu, Apr 16, 2026 at 9:23 AM

To: NoreenOfficialTranscripts <noreenofficialtranscripts@gmail.com>, Rosemary_Scarpelli@ilnd.uscourts.gov

Cc: Raymond Butler II <RaymondEButler@protonmail.com>

Ms. Resendez,

I am writing as counsel of record in the above-referenced matter regarding the official transcript of the hearing held on April 9, 2026 before Judge April Perry on my client's motion for disqualification.

On Tuesday April 14, 2026, I emailed you about opposing counsel's statement that they intended to file an **Answer** was incorrectly rendered as a statement that they intended to file a **motion to dismiss**. I appreciate your attention to that matter.

I have now identified a second, more significant omission in the same transcript. Several statements made by the Court during that hearing, material to the disqualification motion itself, do not appear in the transcript. Specifically, the following statements by the Court are missing: "not only am I friends with Judge Alexakis I am VERY good friends with her..." Judge Perry went on to describe her relationship with Judge Alexakis and Judge Maldonado.

On page 5 the Court stated "I should note that not only did we work together before, we work together now and we are friends as I am with many of my colleagues on the bench." The further statements regarding her relationships with both judges are not reflected anywhere in the delivered transcript. These omissions are material because the hearing concerned the motion for disqualification, and the missing statements bear directly on the issues raised in that motion.

Pursuant to 28 U.S.C. § 753 and the reporter's duty to produce a verbatim record, I respectfully request that you review your stenographic notes and any electronic backup recording of the proceeding and prepare an errata sheet or supplemental transcript that accurately reflects the omitted statements. Please provide the correction as soon as possible and in no event later than April 29, 2026. To assist in verifying and correcting the record, I also request access to any audio backup recording of the hearing (or a copy, if available under Court policy). Please let me know what arrangements can be made for this review.

I am copying Rosemary Scarpelli, Court Reporter Coordinator, on this request for her awareness and assistance if needed. Please let me know promptly if you require any additional information to locate the portions at issue.

Thank you for your prompt attention to this matter. I look forward to your written response.

Kate



Katherine A. London 

KMFL Law

(630) 507-9998

KLondon@KMFLLaw.com

IL ARDC # 6345920

TN BPR # 042941

EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.8 (rev. 1.8.5)
Eastern Division**

Raymond E. Butler II

Plaintiff,

v.

Case No.: 1:25-cv-04443

Honorable April M. Perry

Eli Jackfinn Eddi, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Thursday, April 9, 2026:

MINUTE entry before the Honorable April M. Perry: Hearing held 4/9/2026 on motion to disqualify [245]. For the reasons stated in open court, the motion is denied. The parties are directed to meet and confer to discuss the pending motions, which are ancillary to the case [216][226] and file a joint status update by 5/5/2026. To the extent the filing party intends to persist in the motion, the parties are to propose a briefing schedule. To the extent the filing party intends to withdraw the motion, that should be noted. To the extent the parties cannot agree, each is allowed to note its position separately. The joint status report should also note each party's position about a continued stay of the merits of this matter, in light of either the pending appeal or the Cook County case. No party's status report may exceed 3 pages. If several or all of defendants are in agreement, they should file their 3 pages jointly. Mailed notice. (jcc,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at www.ilnd.uscourts.gov.

EXHIBIT F

ST44 Rev. 10/23
Derived from AO44 Rev. 10/23

UNITED STATES DISTRICT COURT
Northern District of Illinois

Invoice No.: 20260188

Katherine A. London
KMFL Law, Inc.
100 Illinois Street
Suite 200
St. Charles, IL 60174
(630) 507-9998
klondon@kmflaw.com

MAKE PAYMENT TO:

Perscribo Reporting, Inc.
219 South Dearborn
Room 1728
Chicago, IL 60604
(312) 518-3654
noreen@perscriboreporting.com
Tax ID: 16-1653383

CRIMINAL CIVIL

DATE ORDERED: 04-09-2026

DATE DELIVERED:

In the matter of: 25 CV 0443, Butler II v Eli Jackfin Eddi, et al.
Transcript of Poceedings before the HON. APRIL M. PERRY of April 9, 2026.

CATEGORY	ORIGINAL			1 ST COPY			ADDITIONAL COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
30-Day		4.40			1.10			0.75		
14-Day		5.10			1.10			0.75		
7-Day		5.85		50	1.10	55.00		0.75		55.00
3-Day		6.55			1.30			0.90		
Next-Day		7.30			1.45			1.10		
2-Hour		8.70			1.45			1.10		
Realtime		3.70			2.55			1.80		
Misc.	Misc. Charges									
Subtotal										55.00
Less Discount for Late Delivery										
Tax (If Applicable)										
Less Amount of Deposit										
Total Refund										
Total Due										55.00

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:
/s/ Noreen Resendez

DATE:
04-09-2026

EXHIBIT G



KMFL Law
100 Illinois Street
Suite 200
St. Charles, IL 60174

Katherine A. London
KLondon@KMFLLaw.com
(630) 507-9998

April 15, 2026

VIA EMAIL ONLY

Shana A. Shifrin, Esq.
Burke, Warren, MacKay & Serritella, P.C.
330 North Wabash Avenue, Suite 2100
Chicago, Illinois 60611-3607
sshifrin@burkelaw.com

Edna McLain
Amundsen Davis Law
150 North Michigan Avenue, Suite 3300
Chicago, Illinois 60601
emclain@amundsendavislaw.com

Brian Dougherty
Office of Legal Services
60 East Van Buren Street, Suite 1339
Chicago, IL 60605
brian.dougherty@illinois.gov

**Re: FRE 408 Settlement Communication - Final Notice of Intent to File
Raymond E. Butler II v. Catholic Bishop of Chicago, Archdiocese of
Chicago, Maryville Academy**

Counsels:

This firm represents Raymond E. Butler II in connection with the repeated and severe sexual abuse he endured as a minor while residing at Maryville Academy from 1999 to 2003. This correspondence constitutes a settlement

communication protected under Federal Rule of Evidence 408 and is made solely for the purpose of attempting to resolve this matter before litigation.

As detailed in Mr. Butler's prior correspondence dated August 26, 2025, he was sexually abused by Rev. John Smyth, Matthew Whited, and others during his placement at Maryville Academy. The sexual abuse was both well-known and extensively documented within Maryville Academy and the Archdiocese of Chicago at the time it occurred. Mr. Butler personally reported the abuse to David Ryan, a key figure and senior official at Maryville Academy. Despite this direct report, the abuse not only continued but escalated dramatically. Nevertheless, the Catholic Bishop of Chicago ("CBC") and the Archdiocese, which exercised direct oversight and control over Maryville Academy and were also aware of ongoing abuse at Maryville, took no meaningful action to protect Mr. Butler or the other children in its care.

The misconduct was systemic. At least thirty (30) survivors have now come forward with credible accusations of horrific abuse by Smyth and other staff and clergy at Maryville Academy. Matthew Whited was convicted and sentenced to over twenty years in federal prison for his crimes. Additional individuals, including David Ryan, Cathy Ryan and former Augustinian Provincial Robert Prevost (now Pope Leo XIV, who served in the Chicago area from 1999–2001), have been implicated in the widespread cover-up.

Financial irregularities and falsified records at Maryville Academy directly contradict official DCFS documentation, family correspondence, and Mr. Butler's own experiences. These discrepancies reveal a deliberate and ongoing pattern of concealment and deception. There were repeated attempts by Jack and Pessie Finn, rabbi's and trustees of Mr. Butler's family trusts to have psychotropic medication prescribed to him. Contrary to Mr. Butler's explicit refusal of the medication, and despite his therapist Todd Scott documenting that he did not need it, Maryville staff knowingly and falsely recorded that he was compliant with the psychotropic medication regimen. This fabricated documentation formed part of repeated attempts to forcibly medicate him against his will, including direct statements to Mr. Butler that he was required to take medication he knew he did not need. These types of falsified and missing records were systematically used to justify institutionalizing and discrediting victims, including Mr. Butler thereby undermining their credibility and silencing their complaints. Those involved perpetuated an ongoing conspiracy to keep him confined and isolated within the system.

Jack and Pessie Finn, played a significant role in his placement at Maryville Academy through ongoing back-and-forth communications regarding his care and future. The Finns, Maryville and DCFS repeatedly told Mr. Butler that he would be adopted by the Finns, and he expressed his expectation of such

adoption. However, when he raised the issue, Maryville and DCFS later dismissed any anticipated adoption, including the Finns or his maternal grandmother, as mere “fantasy.” Although placement plans were allegedly documented, none were ever executed, leaving Mr. Butler effectively and intentionally “lost” in the system.

The Finn’s further engaged in repeated discussions with Maryville about their level of involvement with him, yet he was ultimately left at Maryville for years and almost never permitted to leave. Individuals in positions of authority at Maryville, in coordination with the Finns, rabbi’s and the trustees of Mr. Butler’s family trusts, conspired to keep him institutionalized. Given Raymond’s credible accusations, the contradictions in Maryville and DCFS records, and the fact that several of those responsible for reporting on him later faced criminal charges, the evidence strongly indicates a deliberate and coordinated conspiracy.

This letter serves as our client’s **final notice of intent to file suit**. If this matter is not resolved through settlement, we will promptly file a federal civil complaint in the United States District Court for the Northern District of Illinois against the Catholic Bishop of Chicago, the Archdiocese of Chicago, Robert Prevost, Blase Cupich, Maryville Academy, Cathy Ryan, David Ryan, Amundsen Davis, Burke, Warren, MacKay & Serritella, P.C., Illinois Department of Child and Family Services, the above-named attorneys in their individual capacities, and all associated entities and individuals. The complaint will assert, among other claims:

1. Civil RICO and RICO Conspiracy (18 U.S.C. §§ 1962(c) and (d)), based on the enterprise’s use of mail fraud, wire fraud, and obstruction of justice to conceal the abuse and falsify records.
2. Childhood Sexual Abuse and Sexual Battery (735 ILCS 5/13-202.2 and common law).
3. Negligent Supervision, Hiring, and Retention.
4. Fraudulent Concealment (735 ILCS 5/13-215).
5. Intentional Infliction of Emotional Distress.
6. Civil Conspiracy.
7. Illinois RICO (720 ILCS 5/33G).
8. Battery and Vicarious Liability / Respondeat Superior.
9. Negligence and Breach of Fiduciary Duty.

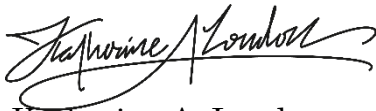
To avoid the necessity of litigation and public exposure of these claims, our client is willing to accept the sum of Twenty-Five Million Dollars (\$25,000,000) in full and final settlement of all claims against all parties.

Payment must be made by wire transfer to our client trust account within fourteen (14) days of receipt of this letter.

This is the final opportunity to resolve this matter confidentially. Should you fail to accept this demand and tender payment by the deadline, we will immediately commence litigation and pursue all available remedies, including treble damages and attorneys' fees under the RICO statutes. We will also proceed with appropriate public disclosure of the allegations through media channels.

This communication does not constitute a waiver of any rights or claims, nor does it admit any liability. All rights are expressly reserved. We remain available to discuss a prompt, confidential resolution.

Respectfully,

A handwritten signature in black ink, appearing to read "Katherine A. London". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Katherine A. London
Attorney for Raymond E. Butler II

Cc: Raymond Butler: RaymondEButler@protonmail.com

Susan J.M. Overbey: soverbey@burkelaw.com

Orlando Gonzalez: orlando.gonzalez@illinois.gov

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals**For the Seventh Circuit
Chicago, Illinois 60604**

Submitted June 12, 2025*

Decided June 17, 2025

BeforeDIANE S. SYKES, *Chief Judge*MICHAEL Y. SCUDDER, *Circuit Judge*DORIS L. PRYOR, *Circuit Judge*

No. 24-2849

UNITED STATES OF AMERICA,
*Plaintiff-Appellee,**v.*MATTHEW W. WHITED,
*Defendant-Appellant.*Appeal from the United States District
Court for the Northern District of
Illinois, Western Division.

No. 3:05 CR 50060

Lindsay C. Jenkins,
*Judge.***ORDER**

Matthew Whited appeals the denial of his motion for compassionate release under 18 U.S.C. § 3582(c)(1)(A)(i). The district judge determined that Whited did not establish an extraordinary and compelling reason for an early release, and that even if

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

he had, the sentencing factors in 18 U.S.C. § 3553(a) weighed against that relief. Because the judge did not abuse her discretion, we affirm.

Whited pleaded guilty in 2004 to several child-exploitation offenses. He was sentenced to 300 months in prison based on the applicable range under the federal Sentencing Guidelines at the time of his sentencing: 296–365 months. But at the time he committed the offenses of conviction, the applicable range was 168–210 months. In 2013, the Supreme Court held that the Ex Post Facto Clause requires courts to apply the guidelines in effect at the time of the offense, not sentencing, if the earlier guidelines produce a lower range. *Peugh v. United States*, 569 U.S. 530, 544 (2013).

Whited has sought relief from his sentence multiple times based on the holding of *Peugh*. His motion under 28 U.S.C. § 2255 failed because *Peugh* does not apply retroactively to cases on collateral review. *See Whited v. United States*, No. 20-1557 (7th Cir. May 5, 2020) (denying request to file successive collateral attack). He later filed a first motion for compassionate release, arguing—to no avail—that *Peugh*'s holding and his health conditions warranted a reduced sentence. *See Whited v. United States*, No. 21-1644, 2022 WL 1259028 (7th Cir. Apr. 28, 2022) (affirming denial of motion for compassionate release).

Whited recently moved again for compassionate release. He argued that he has an extraordinary and compelling reason because his sentence is “unusually long.” U.S.S.G. § 1B1.13(b)(6). Specifically, he asserted that a gross disparity exists between his sentence and the one that would have been imposed if *Peugh* had been in effect at the time of his sentencing. Whited also contended that the factors under 18 U.S.C. § 3553(a) weighed in his favor because he has had “perfect behavior” during his 18 years in prison, the Bureau of Prisons rated him as having a minimum risk of recidivism, a doctor concluded that there was no evidence that he poses a risk of personal harm to others, and the sentencing judge had observed that there was no proof that he ever committed aggression toward minors.

The district judge denied the motion. First, she determined that a long sentence based on a post-sentencing change in the law is not an extraordinary and compelling reason for release. Alternatively, she explained that, were there an extraordinary and compelling reason for Whited's early release, she would still deny the motion because his sentence adequately reflected his serious offense and was necessary to promote respect for the law. Whited appeals, and we review the district judge's reasoning for abuse of discretion. *United States v. Rucker*, 27 F.4th 560, 562 (7th Cir. 2022).

Whited first argues that he has an extraordinary and compelling reason for a sentence reduction because his sentence was unconstitutional at the time it was imposed. Indeed, *Peugh* establishes that Whited was sentenced based on the wrong guidelines range—a higher range that was not in effect at the time of his offense—and an “underlying right necessarily pre-exists [the Supreme Court’s] articulation of the new rule.” *Danforth v. Minnesota*, 552 U.S. 264, 271 (2008). Nevertheless, a change in the law, announced either by statute or by judicial decision, is not an extraordinary and compelling reason for a sentence reduction under § 3582(c)(1)(A)(i). *United States v. Black*, 131 F.4th 542, 546 (7th Cir. 2025); *United States v. Thacker*, 4 F.4th 569, 575 (7th Cir. 2021); *United States v. Brock*, 39 F.4th 462, 466 (7th Cir. 2022).

Whited also argues that the district judge improperly weighed the § 3553(a) factors because he is not a threat to the public, and an unconstitutional sentence can never promote respect for the law. But the judge did not abuse her discretion. She considered Whited’s lack of criminal history and his clean record with respect to prison discipline, but she concluded that these did not justify a sentence reduction. “One good reason for denying a motion such as [Whited’s] is enough,” *United States v. Ugbah*, 4 F.4th 595, 598 (7th Cir. 2021), and the district judge provided one: The existing sentence appropriately reflected the serious nature of Whited’s offenses.

AFFIRMED

EXHIBIT H

Visiting IP	Page Viewed	Date	Time (CDT)	ISP	Location
174.224.222.47	https://kmflaw.com/	Apr-17-2026	17:27:06		
174.224.222.47	https://kmflaw.com/	Apr-17-2026	15:55:50	Verizon Business (Verizon Business)	Chicago, IL
107.77.207.191	https://kmflaw.com/	Apr-17-2026	15:55:30	AT&T Enterprises, LLC (AT&T Enterprises, LLC)	Chicago, IL
174.224.222.47	https://kmflaw.com/	Apr-17-2026	15:55:29	Verizon Business (Verizon Business)	Chicago, IL
107.77.207.191	https://kmflaw.com/	Apr-17-2026	15:55:29	AT&T Enterprises, LLC (AT&T Enterprises, LLC)	Chicago, IL
23.125.110.137	https://kmflaw.com/raymond-butler	Apr-17-2026	14:27:29	AT&T Enterprises, LLC (Private Customer - AT&T Internet Services)	Chicago, IL
166.199.152.42	https://kmflaw.com/home	Apr-17-2026	13:59:58		
166.199.152.42	https://kmflaw.com/home	Apr-17-2026	13:59:53		
166.199.152.42	https://kmflaw.com/active-publicized-cases	Apr-17-2026	13:59:45		
166.199.152.42	https://kmflaw.com/our-attorneys	Apr-17-2026	13:59:16		
166.199.152.42	https://kmflaw.com/why-kmfl-law	Apr-17-2026	13:59:06		
166.199.152.42	https://kmflaw.com/	Apr-17-2026	13:58:56	AT&T Enterprises, LLC (AT&T Enterprises, LLC)	Chicago, IL
74.116.24.253	https://kmflaw.com/why-kmfl-law	Apr-17-2026	13:58:41		
74.116.24.253	https://kmflaw.com/	Apr-17-2026	13:58:27	County of Kane (County of Kane)	Batavia, IL
12.74.213.89	https://kmflaw.com/our-attorneys	Apr-17-2026	12:57:25	AT&T Enterprises, LLC (AT&T Worldnet Services)	Raleigh, NC
4.42.65.130	https://kmflaw.com/our-attorneys	Apr-17-2026	11:17:49	Level 3 (GTE Intelligent Network Services)	Grapevine, TX
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:49:06		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:49:04		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:59		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:55		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:51		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:45		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:43		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:42		
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:42	Cloudflare, Inc. (Cloudflare WARP)	VPN
166.198.149.140	https://kmflaw.com/	Apr-17-2026	10:48:41	AT&T Enterprises, LLC (AT&T Enterprises, LLC)	Park City, IL
140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:41		

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140.248.30.1	https://kmflaw.com/	Apr-17-2026	10:48:36		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:48:16		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:48:09	Cloudflare, Inc. (Cloudflare WARP)	VPN
166.198.149.140	https://kmflaw.com/	Apr-17-2026	10:48:08	AT&T Enterprises, LLC (AT&T Enterprises, LLC)	Park City, IL
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:48:05		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:54		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:53		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:51		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:47		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:42		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:39		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:28		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:24		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:23		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:22		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:21		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:20		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:19		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:18		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:17		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:07		
104.28.103.31	https://kmflaw.com/	Apr-17-2026	10:47:00	Cloudflare, Inc. (Cloudflare WARP)	VPN
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:46:48		
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:46:48		
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:46:46		
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:46:27		
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:46:08	T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
172.58.166.36	https://kmflaw.com/	Apr-17-2026	10:45:55		
172.58.166.36	https://kmflaw.com/	Apr-17-2026	10:45:52	T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:45:42	T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-17-2026	10:45:37	AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:45:35	T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL

172.58.166.36	https://kmflaw.com/	Apr-17-2026	10:45:31		T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:42:29			
174.233.173.202	https://kmflaw.com/	Apr-17-2026	10:41:39		T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-17-2026	10:40:44		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
172.58.166.220	https://kmflaw.com/	Apr-17-2026	10:23:41			
172.58.166.220	https://kmflaw.com/	Apr-17-2026	10:23:37			
172.58.166.220	https://kmflaw.com/	Apr-17-2026	10:23:16			
172.58.166.220	https://kmflaw.com/	Apr-17-2026	10:23:06			
172.58.166.220	https://kmflaw.com/	Apr-17-2026	10:21:28		T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-17-2026	10:20:02			
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-17-2026	10:18:26		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
174.240.240.24	https://kmflaw.com/	Apr-17-2026	10:16:18		Verizon Business (Verizon Business)	Chicago, IL
205.251.178.178	https://kmflaw.com/our-attorneys	Apr-17-2026	9:50:29		123.Net, Inc. (123.Net, Inc.)	Detroit, MI
74.179.68.27	https://kmflaw.com/our-privacy-policy	Apr-17-2026	9:49:44		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
72.153.230.140	https://kmflaw.com/	Apr-17-2026	9:48:29			
72.153.230.140	https://kmflaw.com/	Apr-17-2026	9:48:23		Microsoft Corporation (Microsoft Azure Cloud (westus))	VPN
74.179.68.27	https://kmflaw.com/	Apr-17-2026	9:48:16		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
185.220.100.242	https://kmflaw.com/	Apr-17-2026	4:13:48		F3 Netze e.V. (F3 Netze e.V)	VPN
185.220.101.163	https://kmflaw.com/our-attorneys	Apr-17-2026	4:13:43			
185.220.101.163	https://kmflaw.com/criminal-defense	Apr-17-2026	4:13:39			
185.220.101.163	https://kmflaw.com/active-publicized-cases	Apr-17-2026	4:13:32			
185.220.101.163	https://kmflaw.com/why-kmfl-law	Apr-17-2026	4:13:28			
185.220.101.163	https://kmflaw.com/raymond-butler	Apr-17-2026	4:13:23		Stiftung Erneuerbare Freiheit (CIA TRIAD SECURITY LLC)	VPN
185.220.101.13	https://kmflaw.com/home	Apr-17-2026	4:13:18			
185.220.101.13	https://kmflaw.com/corporate-litigation	Apr-17-2026	4:13:13			

185.220.101.13	https://kmflaw.com/fiduciary-disputes	Apr-17-2026	4:13:08			
185.220.101.13	https://kmflaw.com/contact-us	Apr-17-2026	4:13:03			
185.220.101.13	https://kmflaw.com/	Apr-17-2026	4:12:56		Stiftung Erneuerbare Freiheit (Artikel10 e.V)	VPN
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:36			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:34			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:32			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:29			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:25			
37.19.221.248	https://kmflaw.com/corporate-litigation	Apr-16-2026	22:51:20			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:09			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:08			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:07			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:06			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:05			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:51:04			
37.19.221.248	https://kmflaw.com/active-publicized-cases	Apr-16-2026	22:50:58			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:50:48			
37.19.221.248	https://kmflaw.com/our-attorneys	Apr-16-2026	22:50:45			
37.19.221.248	https://kmflaw.com/raymond-butler	Apr-16-2026	22:49:35		Datacamp Limited (Cdnex HOU)	VPN
172.59.189.2	https://kmflaw.com/	Apr-16-2026	14:40:25		T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL
62.10.205.21	https://kmflaw.com/our-privacy-policy	Apr-16-2026	13:12:55			

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62.10.205.21	https://kmflaw.com/	Apr-16-2026	13:11:26		Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ
185.223.248.240	https://kmflaw.com/	Apr-16-2026	12:21:14		HostRoyale Technologies Pvt Ltd (HostRoyale Technologies)	VPN
34.96.52.16	https://kmflaw.com/	Apr-16-2026	12:21:04			
34.96.52.16	https://kmflaw.com/	Apr-16-2026	12:21:03		Google LLC (Google Cloud (us-west1))	VPN
51.54.38.112	https://kmflaw.com/	Apr-16-2026	11:33:57			
51.54.38.112	https://kmflaw.com/	Apr-16-2026	11:33:53			
51.54.38.112	https://kmflaw.com/	Apr-16-2026	11:33:51		Microsoft Corporation (Microsoft Limited)	VPN
62.10.205.18	https://kmflaw.com/	Apr-16-2026	9:26:45			
62.10.205.18	https://kmflaw.com/	Apr-16-2026	9:26:12		Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ
12.74.213.1	https://kmflaw.com/	Apr-16-2026	8:58:52			
12.74.213.1	https://kmflaw.com/	Apr-16-2026	8:58:30			
12.74.213.1	https://kmflaw.com/	Apr-16-2026	8:57:25		AT&T Enterprises, LLC (AT&T Worldnet Services)	Chicago, IL
51.54.38.123	https://kmflaw.com/	Apr-16-2026	8:50:43			
51.54.38.123	https://kmflaw.com/	Apr-16-2026	8:50:32		Microsoft Corporation (Microsoft Limited)	VPN
109.71.252.182	https://kmflaw.com/	Apr-15-2026	22:00:50		Florian Kolb (Datalix)	VPN
45.154.98.153	https://kmflaw.com/raymond-butler	Apr-15-2026	22:00:45			
45.154.98.153	https://kmflaw.com/corporate-litigation	Apr-15-2026	22:00:39			
45.154.98.153	https://kmflaw.com/fiduciary-disputes	Apr-15-2026	22:00:34			
45.154.98.153	https://kmflaw.com/criminal-defense	Apr-15-2026	22:00:29			
45.154.98.153	https://kmflaw.com/home	Apr-15-2026	22:00:23		1337 Services GmbH (1337 Services GmbH)	VPN
45.84.107.74	https://kmflaw.com/our-attorneys	Apr-15-2026	22:00:19		QuxLabs AB (ROCKET-CLOUD)	VPN
5.45.104.176	https://kmflaw.com/why-kmfl-law	Apr-15-2026	22:00:13		netcup GmbH (NETCUP-GMBH)	VPN
45.84.107.74	https://kmflaw.com/active-publicized-cases	Apr-15-2026	22:00:07			
45.84.107.74	https://kmflaw.com/reviews	Apr-15-2026	22:00:00		QuxLabs AB (ROCKET-CLOUD)	VPN
45.66.35.32	https://kmflaw.com/contact-us	Apr-15-2026	21:59:54			
45.66.35.32	https://kmflaw.com/	Apr-15-2026	21:59:53		Sabotage LLC (Sabotage LLC)	VPN
73.72.220.116	https://kmflaw.com/home	Apr-15-2026	21:12:29			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:12:02			
73.72.220.116	https://kmflaw.com/our-attorneys	Apr-15-2026	21:09:49			
73.72.220.116	https://kmflaw.com/raymond-butler	Apr-15-2026	21:06:48			
73.72.220.116	https://kmflaw.com/our-attorneys	Apr-15-2026	21:06:38			

73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:04:05			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:03:33			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:03:02			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:02:58			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:02:35			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	21:02:34			
73.72.220.116	https://kmflaw.com/	Apr-15-2026	20:55:27	Comcast Cable Communications, LLC (Comcast IP Services, L.L.C.)	Chicago, IL	
174.195.156.138	https://kmflaw.com/	Apr-15-2026	20:52:26	Verizon Business (Verizon Business)	Riverside, CA	
74.179.70.11	https://kmflaw.com/our-privacy-policy	Apr-15-2026	18:41:27			
74.179.70.11	https://kmflaw.com/	Apr-15-2026	18:39:46			
74.179.70.11	https://kmflaw.com/	Apr-15-2026	18:39:44			
74.179.70.11	https://kmflaw.com/	Apr-15-2026	18:39:42	Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN	
73.72.166.119	https://kmflaw.com/	Apr-15-2026	17:53:51			
73.72.166.119	https://kmflaw.com/	Apr-15-2026	17:53:47	Comcast Cable Communications, LLC (Comcast IP Services, L.L.C.)	Evanston, IL	
62.10.205.4	https://kmflaw.com/our-privacy-policy	Apr-15-2026	17:33:01	Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ	
104.185.195.153	https://kmflaw.com/	Apr-15-2026	17:32:00	AT&T Enterprises, LLC (Terry Wiggins)	Evanston, IL	
62.10.205.4	https://kmflaw.com/	Apr-15-2026	17:31:50			
62.10.205.4	https://kmflaw.com/	Apr-15-2026	17:31:43	Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ	
104.185.195.153	https://kmflaw.com/	Apr-15-2026	17:18:59			
104.185.195.153	https://kmflaw.com/	Apr-15-2026	16:48:46	AT&T Enterprises, LLC (Terry Wiggins)	Evanston, IL	
12.74.213.56	https://kmflaw.com/	Apr-15-2026	16:39:32			
12.74.213.56	https://kmflaw.com/	Apr-15-2026	16:39:22	AT&T Enterprises, LLC (AT&T Worldnet Services)	Chicago, IL	
66.158.2.65	https://kmflaw.com/raymond-butler	Apr-15-2026	16:22:48			
66.158.2.65	https://kmflaw.com/why-kmfl-law	Apr-15-2026	16:22:40			
66.158.2.65	https://kmflaw.com/our-attorneys	Apr-15-2026	16:22:35			
66.158.2.65	https://kmflaw.com/our-attorneys	Apr-15-2026	16:09:01			
66.158.2.65	https://kmflaw.com/home	Apr-15-2026	16:08:58			
66.158.2.65	https://kmflaw.com/raymond-butler	Apr-15-2026	15:55:29			
66.158.2.65	https://kmflaw.com/home	Apr-15-2026	15:55:22			
66.158.2.65	https://kmflaw.com/our-attorneys	Apr-15-2026	15:55:15	Illinois Century Network (Illinois Century Network)	Bolingbrook, IL	
173.165.29.145	https://kmflaw.com/our-attorneys	Apr-15-2026	15:55:09	Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	Chicago, IL	
165.225.58.79	https://kmflaw.com/our-attorneys	Apr-15-2026	15:41:49			
165.225.58.79	https://kmflaw.com/	Apr-15-2026	15:41:33	ZSCALER, INC. (Zscaler, Inc)	Chicago, IL	

74.179.68.0	https://kmflaw.com/our-privacy-policy	Apr-15-2026	14:29:05		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
72.152.84.33	https://kmflaw.com/our-privacy-policy	Apr-15-2026	14:28:56			
72.152.84.33	https://kmflaw.com/our-privacy-policy	Apr-15-2026	14:28:56			
72.152.84.33	https://kmflaw.com/home	Apr-15-2026	14:28:56			
72.152.84.33	https://kmflaw.com/	Apr-15-2026	14:27:44		Microsoft Corporation (Microsoft Azure Cloud (centralus))	VPN
74.179.68.0	https://kmflaw.com/	Apr-15-2026	14:27:35		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
107.77.207.83	https://kmflaw.com/	Apr-15-2026	13:33:49		AT&T Enterprises, LLC (AT&T Enterprises, LLC)	Chicago, IL
208.127.76.67	https://kmflaw.com/our-attorneys	Apr-15-2026	13:12:47			
208.127.76.67	https://kmflaw.com/why-kmfl-law	Apr-15-2026	13:12:42			
208.127.76.67	https://kmflaw.com/our-attorneys	Apr-15-2026	13:09:14			
208.127.76.67	https://kmflaw.com/our-attorneys	Apr-15-2026	13:09:09			
208.127.76.67	https://kmflaw.com/	Apr-15-2026	13:08:42		Google LLC (Palo Alto Networks, Inc)	Ashburn, VA
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-15-2026	10:56:30			
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-15-2026	10:56:04		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
174.194.192.182	https://kmflaw.com/	Apr-15-2026	1:16:52		Verizon Business (Verizon Business)	Hayward, CA
149.57.176.27	https://kmflaw.com/contact-us	Apr-14-2026	21:02:10		LogicWeb Inc (LogicWeb Inc)	New York, NY
24.14.234.177	https://kmflaw.com/home	Apr-14-2026	20:43:57			
24.14.234.177	https://kmflaw.com/our-attorneys	Apr-14-2026	20:40:39			
24.14.234.177	https://kmflaw.com/home	Apr-14-2026	20:40:19			
24.14.234.177	https://kmflaw.com/our-attorneys	Apr-14-2026	20:39:52			
24.14.234.177	https://kmflaw.com/home	Apr-14-2026	20:39:26			
24.14.234.177	https://kmflaw.com/our-attorneys	Apr-14-2026	20:39:12		Comcast Cable Communications, LLC (Comcast Cable Communications)	Chicago, IL
136.23.62.15	https://kmflaw.com/	Apr-14-2026	19:06:04		Google LLC (Google One Services)	VPN
24.127.248.79	https://kmflaw.com/	Apr-14-2026	18:11:47			
24.127.248.79	https://kmflaw.com/	Apr-14-2026	18:11:47		Comcast Cable Communications (Comcast Cable Communications Holdings, Inc)	West Bloomfield MI
63.241.40.126	https://kmflaw.com/	Apr-14-2026	14:24:54			
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-14-2026	14:19:31			
63.241.40.126	https://kmflaw.com/	Apr-14-2026	14:19:30		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
172.59.184.242	https://kmflaw.com/	Apr-14-2026	14:19:20		T-Mobile USA, Inc. (T-Mobile USA, Inc.)	Chicago, IL

62.10.205.21	https://kmflaw.com/raymond-butler	Apr-14-2026	14:19:14		
62.10.205.21	https://kmflaw.com/home	Apr-14-2026	14:19:14		
62.10.205.21	https://kmflaw.com/our-privacy-policy	Apr-14-2026	14:19:13		Tiscali Italia SpA (Tiscali Italia SpA)
172.59.184.242	https://kmflaw.com/	Apr-14-2026	14:19:12		T-Mobile USA, Inc. (T-Mobile USA, Inc.)
63.241.40.126	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:19:09		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)
51.54.38.120	https://kmflaw.com/our-privacy-policy	Apr-14-2026	14:19:01		
51.54.38.120	https://kmflaw.com/home	Apr-14-2026	14:19:00		
51.54.38.120	https://kmflaw.com/our-privacy-policy	Apr-14-2026	14:19:00		
51.54.38.120	https://kmflaw.com/home	Apr-14-2026	14:18:59		Everywhere Wireless, LLC (Everywhere Wireless, LLC)
63.241.40.126	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:18:55		
63.241.40.126	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:18:55		
63.241.40.126	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:18:53		
63.241.40.126	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:18:51		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)
51.54.38.120	https://kmflaw.com/our-privacy-policy	Apr-14-2026	14:18:50		
51.54.38.120	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:18:50		Everywhere Wireless, LLC (Everywhere Wireless, LLC)
63.241.40.126	https://kmflaw.com/	Apr-14-2026	14:18:45		
63.241.40.126	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:18:39		
63.241.40.126	https://kmflaw.com/home	Apr-14-2026	14:18:37		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)
104.153.230.41	https://kmflaw.com/	Apr-14-2026	14:18:32		
63.241.40.126	https://kmflaw.com/	Apr-14-2026	14:18:24		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)
62.10.205.21	https://kmflaw.com/	Apr-14-2026	14:18:22		Tiscali Italia SpA (Tiscali Italia SpA)
63.241.40.126	https://kmflaw.com/	Apr-14-2026	14:18:01		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)
62.10.205.18	https://kmflaw.com/home	Apr-14-2026	14:17:59		
62.10.205.18	https://kmflaw.com/our-attorneys	Apr-14-2026	14:17:58		
62.10.205.18	https://kmflaw.com/why-kmfl-law	Apr-14-2026	14:17:58		

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62.10.205.18	https://kmflaw.com/raymond-butler	Apr-14-2026	14:17:54			
62.10.205.18	https://kmflaw.com/home	Apr-14-2026	14:17:54			
62.10.205.18	https://kmflaw.com/our-attorneys	Apr-14-2026	14:17:53		Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ
136.23.62.123	https://kmflaw.com/	Apr-14-2026	14:17:48		Google LLC (Google One Services)	VPN
63.241.40.126	https://kmflaw.com/	Apr-14-2026	14:17:43			
63.241.40.126	https://kmflaw.com/home	Apr-14-2026	14:17:22		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
62.10.205.18	https://kmflaw.com/our-attorneys	Apr-14-2026	14:17:02			
62.10.205.18	https://kmflaw.com/our-attorneys	Apr-14-2026	14:16:59		Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-14-2026	14:16:46		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
205.169.39.43	https://kmflaw.com/?utm_latency=1	Apr-14-2026	12:16:39		CenturyLink Communications (Palo Alto Networks, Inc)	Santa Clara, CA
205.169.39.54	https://kmflaw.com/home	Apr-14-2026	12:16:37		CenturyLink Communications (Palo Alto Networks, Inc)	Santa Clara, CA
43.119.8.132	https://kmflaw.com/corporate-litigation	Apr-14-2026	8:42:17		Alibaba (US) Technology Co., Ltd. (Alibaba.com LLC)	Data Center
47.82.246.0	https://kmflaw.com/corporate-litigation	Apr-14-2026	8:42:15		Alibaba (US) Technology Co., Ltd. (Alibaba.com LLC)	Data Center
146.75.136.32	https://kmflaw.com/	Apr-14-2026	8:10:40			
146.75.136.32	https://kmflaw.com/	Apr-14-2026	8:10:39		Fastly, Inc. (iCloud Private Relay)	VPN
34.116.171.163	https://kmflaw.com/home	Apr-13-2026	9:57:16		Google LLC (Google Cloud (europe-central2))	VPN
34.116.234.102	https://kmflaw.com/our-attorneys	Apr-13-2026	9:52:55		Google LLC (Google Cloud (europe-central2))	VPN
34.116.171.163	https://kmflaw.com/home	Apr-13-2026	9:52:22		Google LLC (Google Cloud (europe-central2))	VPN
34.116.234.102	https://kmflaw.com/?utm_latency=1	Apr-13-2026	9:52:11		Google LLC (Google Cloud (europe-central2))	VPN
34.72.176.129	https://kmflaw.com/home	Apr-13-2026	9:51:39		Google LLC (Google Cloud (us-central1))	VPN
23.147.240.217	https://kmflaw.com/our-attorneys	Apr-13-2026	9:44:54		CIBC Bank USA (CIBC Bank USA)	Chicago, IL
54.174.58.241	https://kmflaw.com/	Apr-13-2026	6:43:44		Amazon.com, Inc. (AWS EC2 (us-east-1))	VPN
64.62.158.119	https://kmflaw.com/our-attorneys	Apr-12-2026	9:04:49		Hurricane Electric LLC (Diffbot Corp)	Data Center
216.218.191.229	https://kmflaw.com/	Apr-12-2026	8:53:38		Hurricane Electric LLC (Hurricane Electric)	Data Center
172.125.5.220	https://kmflaw.com/	Apr-11-2026	21:41:35		AT&T Enterprises, LLC (AT&T Corp)	Midlothian, TX
205.169.39.19	https://kmflaw.com/	Apr-11-2026	19:57:41		CenturyLink Communications (Palo Alto Networks, Inc)	Santa Clara, CA
71.91.72.167	https://kmflaw.com/	Apr-11-2026	18:01:04		Charter Communications (Spectrum)	Birmingham, AL
73.189.25.85	https://kmflaw.com/	Apr-11-2026	15:52:19		Comcast Cable Communications (Comcast IP Services, L.L.C.)	San Jose, CA
174.224.243.140	https://kmflaw.com/	Apr-11-2026	13:30:12			
174.224.243.140	https://kmflaw.com/	Apr-11-2026	13:06:48		Verizon Business (Verizon Business)	Villa Park, IL
34.118.35.22	https://kmflaw.com/	Apr-11-2026	11:16:54		Google LLC (Google Cloud (europe-central2))	VPN

91.98.178.78	https://kmflaw.com/	Apr-11-2026	8:10:48		Hetzner Online GmbH (Hetzner Online GmbH)	VPN
68.193.50.236	https://kmflaw.com/	Apr-10-2026	19:39:50		Cablevision Systems Corp. (Optimum Online (Cablevision Systems))	Bergenfield, NJ
99.144.186.107	https://kmflaw.com/our-attorneys	Apr-09-2026	23:13:38			
99.144.186.107	https://kmflaw.com/home	Apr-09-2026	23:13:14			
99.144.186.107	https://kmflaw.com/our-attorneys	Apr-09-2026	23:12:32		AT&T Enterprises, LLC (AT&T Corp)	Carpentersville, IL
104.244.242.183	https://kmflaw.com/criminal-defense	Apr-09-2026	22:21:42			
104.244.242.183	https://kmflaw.com/reviews	Apr-09-2026	22:20:16			
104.244.242.183	https://kmflaw.com/our-attorneys	Apr-09-2026	22:19:23			
104.244.242.183	https://kmflaw.com/our-attorneys	Apr-09-2026	22:19:15		Everywhere Wireless, LLC (Everywhere Wireless, LLC)	Chicago, IL
98.42.117.42	https://kmflaw.com/our-attorneys	Apr-09-2026	16:54:07		Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	Sonoma, CA
38.122.112.98	https://kmflaw.com/our-attorneys	Apr-09-2026	16:18:28			
38.122.112.98	https://kmflaw.com/	Apr-09-2026	16:18:20			
38.122.112.98	https://kmflaw.com/raymond-butler	Apr-09-2026	16:16:21			
38.122.112.98	https://kmflaw.com/	Apr-09-2026	16:16:07		Cogent Communications (Hinshaw & Culbertson)	Chicago, IL
174.255.136.17	https://kmflaw.com/	Apr-09-2026	16:06:44			
174.255.136.17	https://kmflaw.com/	Apr-09-2026	16:05:48			
174.255.136.17	https://kmflaw.com/	Apr-09-2026	16:05:10		Verizon Business (Verizon Business)	Springfield, MO
38.104.59.114	https://kmflaw.com/raymond-butler	Apr-09-2026	13:32:14		Cogent Communications (Alexandria Library)	Alexandria, VA
149.57.176.255	https://kmflaw.com/our-privacy-policy	Apr-09-2026	12:29:21		LogicWeb Inc (LogicWeb Inc)	New York, NY
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:51:34			
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:51:04			
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:50:47			
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:50:22			
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:50:14			
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:49:54			
174.239.113.217	https://kmflaw.com/	Apr-09-2026	10:49:04		Verizon Business (Verizon Business)	Chicago, IL
63.241.40.126	https://kmflaw.com/our-attorneys	Apr-09-2026	9:27:17		AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
149.107.79.148	https://kmflaw.com/our-attorneys	Apr-09-2026	5:45:37			
149.107.79.148	https://kmflaw.com/our-attorneys	Apr-09-2026	5:45:33		ITS Technology Group Limited (ITS Technology Group Limited)	Cheltenham, England
162.231.142.74	https://kmflaw.com/raymond-butler	Apr-08-2026	20:52:09			

162.231.142.74	https://kmflaw.com/	Apr-08-2026	20:51:38		AT&T Enterprises, LLC (AT&T Corp)	Naperville, IL
206.51.119.19	https://kmflaw.com/raymond-butler	Apr-08-2026	20:28:33			
206.51.119.19	https://kmflaw.com/raymond-butler	Apr-08-2026	20:25:37			
206.51.119.19	https://kmflaw.com/reviews	Apr-08-2026	20:25:21			
206.51.119.19	https://kmflaw.com/our-attorneys	Apr-08-2026	20:24:57			
206.51.119.19	https://kmflaw.com/raymond-butler	Apr-08-2026	20:12:57		Baraga Telephone Company (Baraga Telephone Company)	L'Anse, MI
50.203.146.7	https://kmflaw.com/	Apr-08-2026	15:53:35		Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	New York, NY
51.54.38.123	https://kmflaw.com/	Apr-08-2026	15:39:13		Microsoft Corporation (Microsoft Limited)	VPN
74.179.70.50	https://kmflaw.com/home	Apr-08-2026	14:53:18		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
74.179.68.90	https://kmflaw.com/home	Apr-08-2026	14:53:14			
74.179.68.90	https://kmflaw.com/raymond-butler	Apr-08-2026	14:53:13			
74.179.68.90	https://kmflaw.com/our-privacy-policy	Apr-08-2026	14:53:13		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
74.179.70.50	https://kmflaw.com/raymond-butler	Apr-08-2026	14:53:05			
74.179.70.50	https://kmflaw.com/our-privacy-policy	Apr-08-2026	14:53:03		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
74.179.68.90	https://kmflaw.com/	Apr-08-2026	14:52:14		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
74.179.70.50	https://kmflaw.com/	Apr-08-2026	14:52:10		Microsoft Corporation (Microsoft Azure Cloud (westus2))	VPN
98.227.191.11	https://kmflaw.com/why-kmfl-law	Apr-08-2026	11:06:39			
98.227.191.11	https://kmflaw.com/our-attorneys	Apr-08-2026	11:05:56			
98.227.191.11	https://kmflaw.com/	Apr-08-2026	11:05:46		Comcast Cable Communications, LLC (Comcast Cable Communications, Inc.)	Glenview, IL
50.171.43.166	https://kmflaw.com/raymond-butler	Apr-08-2026	10:59:10		Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	Chicago, IL
47.165.36.54	https://kmflaw.com/our-attorneys	Apr-08-2026	10:50:51			
47.165.36.54	https://kmflaw.com/home	Apr-08-2026	10:50:44			
47.165.36.54	https://kmflaw.com/	Apr-08-2026	10:50:29		Frontier Communications of America, Inc. (Frontier Communications Corporation)	Norwalk, CT
216.213.24.7	https://kmflaw.com/our-privacy-policy	Apr-08-2026	5:06:25		Sprious LLC, Blazing SEO, LLC (Emeigh Investments LLC)	VPN
173.9.227.41	https://kmflaw.com/our-attorneys	Apr-07-2026	18:01:58			
173.9.227.41	https://kmflaw.com/active-publicized-cases	Apr-07-2026	17:59:05		Comcast Cable Communications, LLC (Comcast Business Communications, LLC)	Westchester, IL

63.241.40.126	https://kmflaw.com/our-attorneys	Apr-07-2026	17:42:27	AT&T Enterprises, LLC (CI - Administrative Office of The United States Courts SID-19043)	San Diego, CA
173.9.227.41	https://kmflaw.com/why-kmfl-law	Apr-07-2026	17:41:36		
173.9.227.41	https://kmflaw.com/raymond-butler	Apr-07-2026	17:38:51		
173.9.227.41	https://kmflaw.com/our-attorneys	Apr-07-2026	17:38:11		
173.9.227.41	https://kmflaw.com/fiduciary-disputes	Apr-07-2026	17:34:40		
173.9.227.41	https://kmflaw.com/corporate-litigation	Apr-07-2026	17:34:32		
173.9.227.41	https://kmflaw.com/our-attorneys	Apr-07-2026	17:34:06	Comcast Cable Communications, LLC (Comcast Business Communications, LLC)	Westchester, IL
68.132.245.219	https://kmflaw.com/our-attorneys	Apr-07-2026	16:48:41		
68.132.245.219	https://kmflaw.com/raymond-butler	Apr-07-2026	16:47:53		
68.132.245.219	https://kmflaw.com/	Apr-07-2026	16:47:30		
71.239.72.178	https://kmflaw.com/	Apr-07-2026	14:40:31	Comcast Cable Communications, LLC (Comcast Cable Communications)	Aurora, IL
50.171.43.166	https://kmflaw.com/raymond-butler	Apr-07-2026	11:47:25		
50.171.43.166	https://kmflaw.com/home	Apr-07-2026	11:29:11		
50.171.43.166	https://kmflaw.com/our-attorneys	Apr-07-2026	11:28:59		
50.171.43.166	https://kmflaw.com/our-attorneys	Apr-07-2026	11:28:17	Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	Chicago, IL
96.84.75.129	https://kmflaw.com/our-attorneys	Apr-07-2026	10:21:17	Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	Chicago, IL
138.226.27.190	https://kmflaw.com/raymond-butler	Apr-07-2026	7:36:06	Contact Consumers ()	San Francisco, CA
71.214.218.218	https://kmflaw.com/	Apr-06-2026	23:55:31		
71.214.218.218	https://kmflaw.com/	Apr-06-2026	23:55:26		
71.214.218.218	https://kmflaw.com/	Apr-06-2026	23:54:07		
71.214.218.218	https://kmflaw.com/	Apr-06-2026	23:53:49		
71.214.218.218	https://kmflaw.com/	Apr-06-2026	23:50:28	CenturyLink Communications, LLC (CenturyLink Communications, LLC)	Orlando, FL
98.227.191.216	https://kmflaw.com/raymond-butler	Apr-06-2026	23:11:25		
98.227.191.216	https://kmflaw.com/active-publicized-cases	Apr-06-2026	23:10:48		
98.227.191.216	https://kmflaw.com/home	Apr-06-2026	23:10:00		

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98.227.191.216	https://kmflaw.com/raymond-butler	Apr-06-2026	23:09:50			
98.227.191.216	https://kmflaw.com/raymond-butler	Apr-06-2026	22:39:20			
98.227.191.216	https://kmflaw.com/our-attorneys	Apr-06-2026	22:39:02		Comcast Cable Communications, LLC (Comcast Cable Communications, Inc.)	Glenview, IL
76.150.128.69	https://kmflaw.com/	Apr-06-2026	17:48:24			
76.150.128.69	https://kmflaw.com/	Apr-06-2026	16:00:49		Comcast Cable Communications, LLC (Comcast Cable Communications, LLC)	Chicago, IL
62.10.205.21	https://kmflaw.com/	Apr-06-2026	14:20:03			
62.10.205.21	https://kmflaw.com/	Apr-06-2026	14:19:58		Tiscali Italia SpA (Tiscali Italia SpA)	Phoenix, AZ
72.152.84.9	https://kmflaw.com/	Apr-06-2026	14:07:25		Microsoft Corporation (Microsoft Azure Cloud (centralus))	VPN

EXHIBIT I

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF

Katherine A. London

An Attorney

)
)
)
)
)

No. 26 D 004

(Before the Executive Committee)

ORDER

Attorney Katherine A. London was admitted to this Court's General Bar on June 3, 2025.

On November 7, 2025, the United States Court of Appeals for the Seventh Circuit entered an Order sanctioning Katherine A. London \$750, issued a public reprimand, and forwarded a copy of the Order to the Attorney Registration and Disciplinary Commission of the Illinois Supreme Court for any action it deems appropriate.

To date, pursuant to Rule 83.26(c) of the Local Rules of this Court, Ms. London has not notified this Court of the discipline issued by the United States Court of Appeals for the Seventh Circuit. Therefore,

IT IS ORDERED that Katherine A. London is suspended from the practice of law immediately, until she pays the \$750 sanction to the United States Court of Appeals for the Seventh Circuit, until the Attorney Registration and Disciplinary Commission resolves its investigation, and until further order of this court.

IT IS FURTHER ORDERED that any password issued to Katherine A. London for access to the electronic filing system shall be disabled until the attorney is reinstated to the General Bar of this Court.

IT IS FURTHER ORDERED that within twenty-one (21) days of the docketing of this order, Katherine A. London shall notify by certified mail, return receipt requested, all clients to whom Katherine A. London is responsible for pending matters before this Court of the fact that the attorney cannot represent them during the suspension period.

IT IS FURTHER ORDERED that within thirty-five (35) days of the docketing of this order, Katherine A. London shall file a declaration stating that the attorney has so notified any clients and indicating the address to which subsequent communications may be addressed with the Clerk of the Court via email to ILNDAAttorneyDiscipline@ilnd.uscourts.gov.

IT IS FURTHER ORDERED that Katherine A. London shall keep and maintain records evidencing compliance with this order so that proof of compliance will be available if needed for any subsequent proceeding instituted by or against the attorney.

IT IS FURTHER ORDERED that Katherine A. London shall provide the Clerk of Court a copy of the receipt proving payment of the sanction to ILNDAAttorneyDiscipline@ilnd.uscourts.gov.

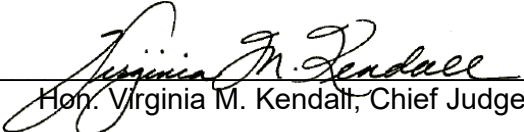
IT IS FURTHER ORDERED that the Clerk of the Court shall post this Order on the docket in every pending case which the attorney has filed an attorney appearance.

IT IS FURTHER ORDERED that the Clerk of Court shall cause a copy of this Order to be emailed to Katherine A. London at klondon@kmflaw.com, the email address in the attorney record in CM/ECF, delivery receipt requested.

IT IS FURTHER ORDERED that the Clerk of Court shall cause a copy of this Order to be sent to the Attorney Registration and Disciplinary Commission of the Illinois Supreme Court.

ENTER:

FOR THE EXECUTIVE COMMITTEE


Hon. Virginia M. Kendall, Chief Judge

Dated in Chicago, IL this 17th day of April 2026

EXHIBIT J 1

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 align="center">RAYMOND E. BUTLER II, Plaintiff - Appellant</p> <p align="center">v.</p> <p align="center">ELI JACKFINN EDDI, et al., Defendants - Appellees</p> <p align="center">and</p> <p align="center">CIBC BANK USA, Appellee</p>
Originating Case Information:	
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

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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.

EXHIBIT J 2

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

November 19, 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>
Originating Case Information:	
District Court No: 1:25-cv-04443 Northern District of Illinois, Eastern Division District Judge Georgia N. Alexakis	

Upon consideration of the **MOTION FOR EN BANC REVIEW**, filed on November 16, 2025, by counsel for the appellant,

IT IS ORDERED that the motion for en banc review is **DENIED**.

EXHIBIT J 3

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

November 21, 2025

By the Court:

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

Upon consideration of the **PETITION FOR REHEARING ON SANCTION ORDER**, filed on November 16, 2025, by counsel for the appellant,

IT IS ORDERED that the request for reconsideration and the alternative request for en banc review are **DENIED**.