

Exhibit 1



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July 27, 2026

Re: Raymond E. Butler, II v Eli Jackfinn Eddi a/k/a Ely Eddi , et al.
1:25-cv-04443/N.D. IL

Dear Mr. Callahan:

I write in my individual capacity as former counsel for Raymond E. Butler, II, and as one of the persons against whom your clients seek sanctions in ECF Nos. 271 and 272.

I no longer represent Mr. Butler. My attorney-client relationship with him ended on September 2, 2025, and I moved to withdraw that same day. The Court granted my motion to withdraw on May 21, 2026. I therefore cannot file a response on behalf of "Plaintiff," coordinate or control Plaintiff's response, make litigation decisions for Plaintiff, or adopt positions taken by Mr. Butler or Ms. London after my representation ended.

Before requiring me to incur the considerable uncompensated time and expense necessary to defend against ECF Nos. 271 and 272, I ask that your clients reconsider whether those filings can properly be maintained against me in their present form.

Opportunity to Withdraw, Correct, or Narrow ECF Nos. 271-272

The proposed motion served in August 2025 principally concerned ECF No. 167 and related advocacy then before the Court. The motion filed in July 2026, however, seeks materially broader relief and relies upon substantial later conduct in which I had no involvement.

Most notably, ECF No. 271 now expressly requests dismissal of Plaintiff's entire action with prejudice as a sanction. The filed motion supports that request through an alleged "unbroken pattern" of misconduct extending well beyond August 2025, including subsequent appeals, judicial-disqualification filings, separate litigation against members of the judiciary, disciplinary proceedings involving Ms. London, and later filings by Mr. Butler.

As indicated by my appearances and signed filings and correspondence, I did not pursue those subsequent matters. I did not advocate in the later appellate filings, judicial-disqualification motions, separate litigation, disciplinary submissions, or pro se filings now invoked by Movants. None of that conduct existed when the proposed Rule 11 motion was served in August 2025, none of it could have been withdrawn or corrected during the 2025 safe-harbor period, and none of it may properly establish my knowledge, inquiry, intent, or purpose when ECF No. 167 was filed.

ECF No. 272 states in footnote 1 that the differences between the filed memorandum and the memorandum transmitted in August 2025 consist of an additional footnote, an updated procedural-history section, deletions made to comply with page limitations, and a font change. That statement addresses only the memorandum. It does not address the separate relief requested in ECF No. 271, including the newly made express request for dismissal with prejudice, or explain how later events that did not exist when the proposed motion was served may support a party-initiated Rule 11 motion against former counsel. Although the served memorandum mentioned dismissal as a possible sanction in a footnote, its conclusion did not request dismissal, and it did not base such relief upon later events that had not yet occurred.

The filed papers also combine Rule 11, 28 U.S.C. § 1927, and the Court's inherent authority without adequately identifying which conduct is asserted against which respondent under which source of authority. Those standards are materially different. Collective references to "Plaintiff and his counsel" do not provide meaningful notice of the particular conduct allegedly attributable to me, the applicable culpability standard, or the expenses supposedly caused by my individual actions.

Accordingly, please confirm whether Movants will withdraw, correct, or narrow ECF Nos. 271 and 272 as follows:

1. Please confirm whether Movants will withdraw their request for sanctions against me personally. If so, please agree to file an appropriate notice or stipulation promptly.
2. If Movants intend to proceed against me, please withdraw the request for dismissal with prejudice and the request for a prospective filing restriction to the extent either is based upon conduct occurring after service of the August 2025 proposed motion or upon conduct not attributable to me. I am no longer Plaintiff's counsel, possess no authority to file papers on his behalf, and did not participate in the later filing activity upon which Movants rely. Please identify what conduct by me could support prospective restrictions against an attorney who has already withdrawn.
3. Please withdraw any reliance upon Ms. London's later appellate filings, disciplinary proceedings, judicial-disqualification motions, separate actions, or other post-September 2, 2025 conduct as a basis for sanctions against me. The same applies to Mr. Butler's later pro se filings, communications, appeals, and motions. Conduct by

others after my representation ended cannot establish the reasonableness of my inquiry, my knowledge, my intent, or my purpose in July or August 2025.

4. Please correct any suggestion that the Seventh Circuit found ECF No. 167, the appeal from the denial of the asset-related relief, or my conduct frivolous. The Seventh Circuit affirmed the denial of the requests to lift the stay, freeze assets, and appoint a neutral fiduciary; dismissed the protective-order portion of the appeal for lack of appellate jurisdiction; and characterized the separate request for mandamus and motion to supplement that request as frivolous. Those later filings and that limited frivolousness determination should not be attributed to me.
5. Please also correct the assertion that ECF No. 227 imposed a blanket prohibition against all motion practice, including every ancillary motion. ECF No. 227 recognized that the Court retained authority over ancillary matters, identified two pending ancillary motions, and exercised its discretion to continue those motions while appellate proceedings remained pending. It did not expressly prohibit the filing of every additional ancillary motion.
6. Please identify each category of fees, costs, or other monetary relief that Movants contend was caused by my individual conduct. Any such amounts should be distinguished from expenses resulting from conduct by Mr. Butler or Ms. London, subsequent appeals, later motions, the separate litigation involving members of the judiciary, disciplinary proceedings, or events occurring after my representation ended.
7. The proposed Rule 11 motion was served on August 22, 2025, only five days before the August 27 hearing and adjudication of ECF No. 167. Please identify the authority upon which Movants rely in contending that a party-initiated Rule 11 motion may proceed where the challenged filing was adjudicated before expiration of the ordinary 21-day period in which it could be withdrawn or appropriately corrected.
8. Please identify the exact document Movants contend was served pursuant to Rule 11(c)(2), and confirm whether Movants contend that every allegation, factual ground, respondent, and form of relief now presented in ECF No. 271 appeared in the document served in August 2025. In particular, please address ECF No. 271's first express request that the action be dismissed with prejudice and the reliance upon events that had not yet occurred when the proposed motion was served.
9. Please withdraw any contention that the August 27, 2025 hearing produced an express finding that I fabricated evidence, manipulated CMS records, knowingly made a false statement, failed to conduct a reasonable inquiry, acted in bad faith, filed ECF No. 167 to harass, or violated Rule 11. The Court denied extraordinary interim relief after considering the parties' competing evidence. I am unaware of any individualized finding that my conduct was frivolous, dishonest, reckless, or undertaken for an improper purpose.
10. Finally, to the extent Movants seek sanctions against me based upon particular language in ECF No. 203, please identify the factual basis upon which they attribute each challenged statement to me individually, including whether they contend that I

drafted, authorized, personally advocated, or knowingly adopted the specific language at issue.

For each position Movants intend to maintain against me, please identify the particular filing, statement, or act at issue; the date of the conduct; the source of sanctioning authority invoked; the applicable legal standard; the relief sought; the fees or costs allegedly caused by that conduct; and the evidentiary basis for attributing it to me individually.

This request provides Movants a fair opportunity to withdraw, correct, or narrow their filing before unnecessary expense and additional motion practice occur. It is not intended to substitute for any separate notice or procedure that may be required under Rule 11(c)(2), and I reserve all rights concerning the propriety of ECF Nos. 271 and 272.

Clarification of ECF No. 275 & Briefing Procedure

Your motion nevertheless seeks relief against me personally, including monetary sanctions, a prospective filing restriction, and other relief. ECF No. 275, however, directs only “Plaintiff” to file a response by August 10, 2026.

The order does not expressly direct me to respond, state that I may file a separate response in my individual capacity, establish a page limit for my separate response, or address the limited sur-reply I previously requested.

I cannot respond as counsel for Plaintiff, and my interests are materially different from those of Mr. Butler and Ms. London. A separate response is therefore necessary to the extent your motion seeks relief against me personally.

Please confirm whether Movants agree to submit a joint request asking the Court to clarify that:

1. I may file a separate response solely on my own behalf and in my individual capacity as a former-counsel sanctions respondent;
2. I am not required to join, coordinate with, adopt, or respond on behalf of Mr. Butler or Ms. London;
3. I may file my separate response on or before August 14, 2026, which is 28 days after ECF Nos. 271 and 272 were filed;
4. I may file a separate response not exceeding 25 pages, excluding the caption, tables, signature block, certificates, and exhibits;
5. Movants may file a reply within 14 days after my separate response, subject to the Court’s applicable reply-page limitation; and
6. I may file, without further leave, a limited sur-reply not exceeding seven pages within seven days after Movants’ reply, confined exclusively to arguments, authorities, evidence, factual assertions, or requests for relief first presented in reply.

No further briefing would be permitted absent leave of Court.

ECF No. 275 presently establishes August 10, 2026 as Plaintiff's response deadline but does not expressly state whether that deadline applies to me individually. Unless and until the Court clarifies the order, I will proceed on the assumption that August 10 may be treated as applicable to me, without waiving my objection to that interpretation. My request for clarification and an adjusted schedule should not be construed as an intention to disregard the existing order.

Pending clarification by the Court, please also confirm that Movants will not contend that I defaulted, waived any objection, or failed to respond merely because I did not file a response on behalf of "Plaintiff" by August 10, 2026.

A separate response and adequate page allowance are warranted because the filed motion:

- invokes three distinct sanctions authorities;
- seeks relief against three differently situated respondents;
- incorporates a lengthy record extending across several courts and proceedings;
- requests monetary, prospective, and case-terminating sanctions;
- relies substantially upon conduct occurring after my representation ended;
- raises threshold issues concerning safe harbor, notice, timeliness, causation, individualized responsibility, and the differences between the served and filed motions; and
- requires me to distinguish my conduct from subsequent conduct by Mr. Butler and Ms. London.

A limited sur-reply is likewise appropriate because Movants' reply may attempt to identify new conduct, new expenses, new authorities, or new theories of attribution that are not adequately presented in ECF Nos. 271 and 272. Requiring a separate motion for leave after the reply would create avoidable expense and additional motion practice. A narrowly confined sur-reply authorized in advance would instead permit a complete record without unfairly extending briefing.

Preservation of Objections & Notice of Potential Relief

Nothing in this letter waives any procedural or substantive objection to ECF Nos. 271 and 272. I expressly preserve all objections concerning, among other matters:

- compliance with Rule 11's safe-harbor requirements;
- adjudication of the challenged filing before expiration of the safe-harbor period;
- the material differences between the motion served in August 2025 and the allegations and relief presented in July 2026;
- reliance upon conduct occurring after service of the proposed motion;
- reliance upon conduct occurring after my representation ended;

- timeliness and delay;
- notice and due process;
- individualized responsibility;
- causation;
- proportionality;
- the availability of dismissal or prospective filing restrictions;
- the attribution of another person's conduct to me;
- the evidentiary basis for the factual assertions made against me;
- the availability of relief under Rule 11, § 1927, or the Court's inherent authority; and
- my right to seek appropriate expenses, fees, sanctions, or other relief arising from the filing and continued prosecution of ECF Nos. 271 and 272.

At this time, I ask that your clients reassess whether there is a good-faith factual and legal basis to continue seeking sanctions against me personally. I am unaware of any finding at the August 27, 2025 hearing that I fabricated evidence, knowingly made a false statement, failed to investigate, acted in bad faith, or filed ECF No. 167 for an improper purpose. I sought withdrawal immediately after my representation ended and did not participate in the subsequent litigation conduct upon which Movants now rely.

Should Movants continue pursuing relief against me without an adequately individualized factual and legal basis after receiving this notice, I reserve the right to seek all appropriate relief, including reasonable expenses and fees to the extent recoverable, sanctions under 28 U.S.C. § 1927, relief under the Court's inherent authority, relief available under Rule 11(c)(2), and any other appropriate remedy.

This reservation is not intended to escalate the dispute. Its purpose is to provide Movants with notice of the significant procedural and factual defects in their filing and a fair opportunity to withdraw, correct, or narrow their positions before I am forced to incur further expense defending against them.

Please provide Movants' position by the close of business on July 28, 2026, so that any agreed submission or, if necessary, motion for clarification may be presented promptly without jeopardizing the existing response deadline.

Sincerely,

/s/ Racine M. Miller

Racine M. Miller
Attorney & Counselor

RM/rm

CC: Ms. Katherine London, Esq. (Email Only)
Mr. Raymond Butler (Email Only)