

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

RAYMOND E. BUTLER, II,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-04443

Hon. April M. Perry

**PLAINTIFF’S OBJECTION TO DEFENDANT ILANA EDDI’S
STATEMENT IN SUPPORT OF FEE AWARD (ECF 288)**

Plaintiff Raymond E. Butler II, appearing pro se, respectfully objects to Defendant Ilana Eddi’s Statement in Support of Fee Award Against Plaintiff and in Favor of Defendant Ilana Eddi (ECF 288) and the accompanying Statement of Fees (Exhibit A). The requested \$23,739.00 is unreasonable, inflated, and inconsistent with this Court’s September 17, 2026 Memorandum Opinion and Order (ECF 287). The Statement also suffers from fundamental due-diligence failures and seeks fees for work outside the scope of the Court’s award.

I. BACKGROUND AND SCOPE OF THE COURT’S AWARD

On September 17, 2026, this Court granted Defendant Eddi’s Rule 11 motion for sanctions (Doc. 268) solely to the extent it sought fees attributable to Plaintiff’s motion to disqualify Attorney Robin Maher. The Court ordered: “Plaintiff is ordered to pay the reasonable attorneys’ fees and costs attributable to the motion to disqualify Attorney Maher, accruing from May 21, 2026,” the date Plaintiff was permitted to proceed pro se and elected to pursue the motion. ECF 287 at 10. The Court expressly limited the award to fees caused by the disqualification motion itself and declined broader relief.

ECF 288, however, seeks \$23,739.00 for work on both the response to the motion to disqualify *and* the Rule 11 motion for sanctions, plus related tasks. Much of the billed time predates or is unrelated to any reasonable response to the disqualification motion after May 21, 2026. The Statement is signed on behalf of “ELY EDDI,” not Defendant Ilana Eddi, further undermining its reliability.

II. THE STATEMENT IS SIGNED FOR THE WRONG CLIENT AND LACKS DUE DILIGENCE

The body of ECF 288 repeatedly identifies the fee request as being made by and for “Defendant Ilana Eddi.” Yet the signature block states “Respectfully Submitted, ELY EDDI” and is signed “By: /s/ Robin Maher As one of his attorneys.” ECF 288 at 3. Ely Eddi (also referred to as Eli Jackfinn Eddi) is a separate defendant. According to deposition testimony in the related state-court action (Cook County Case No. 22 CH 675), Ely Eddi has repeatedly avoided service, has not filed an appearance in that action in a manner consistent with active participation, and has indicated that legal fees are being paid with the expectation of reimbursement from the trust. See Deposition of Ely Eddi (June 18, 2026).

This mismatch is not a mere typographical error. It reflects a lack of due diligence and raises questions about which client is actually incurring and seeking the fees. The Court's order awarded fees only in connection with the motion directed at Attorney Maher in this federal action concerning Defendant Ilana Eddi's interests. Fees paid or advanced by or for Ely Eddi, or for work on the state-court matter, are not recoverable here.

III. THE FEE REQUEST INCLUDES WORK OUTSIDE THE SCOPE OF THE AWARD AND IS EXORBITANTLY PADDED

The Court's award is limited to reasonable fees attributable to the motion to disqualify Attorney Maher from May 21, 2026 forward. ECF 288's Statement of Fees includes extensive time on the Rule 11 motion itself (e.g., 4.40 hours on May 21, 5.90 hours on May 22, 4.00 hours on May 26 for Robin D. Maher alone, plus substantial paralegal time on cite-checking and service of the sanctions motion). These entries are not "attributable to the motion to disqualify"; they are the costs of prosecuting the sanctions motion. Rule 11(c)(2) permits recovery of expenses incurred *for the motion*, but the Court has already defined the recoverable scope as the fees caused by the disqualification motion.

The response to the motion to disqualify appears to have been largely derivative of filings already prepared in the related state-court action (22 CH 675, and captioned as such incorrectly). The billed hours for drafting, revising, and researching the federal response (multiple entries by Erin M. Mayer and Robin D. Maher totaling well over 10 hours of partner time) are disproportionate for a response that largely recapitulates prior arguments. As a *pro se* litigant, Plaintiff can prepare and file a document on PACER in minutes. The Statement claims that filing and service tasks required two professionals and more than half an hour each—tasks that are routine and do not justify the claimed rates and time.

Rates are also inconsistently applied. One entry bills Robin D. Maher at \$670 rather than the claimed \$875 rate, and the overall request far exceeds what is reasonable for the limited work authorized by the Court. Block billing, vague task descriptions ("work on motion for sanctions," "review and revise"), and inclusion of time for the sanctions motion itself further support a substantial reduction or denial of the request.

IV. ADDITIONAL CONCERNS REGARDING REASONABLENESS AND PROCESS

Attorney Maher's involvement raises further questions about the reasonableness of the fees. Materials from the state-court proceeding indicate efforts to narrow the scope of the trust accounting to "only the 1993 trust," a limitation that is not specified in the complaint or consistently advanced by the client, and indicates use of confidential information disclosed by the plaintiff in consultations. Deposition testimony by the defendants reflects that disbursement documents do not identify a specific date and could relate to any Jack Finn Irrevocable Trust. The use of information obtained in the course of representation to advance such positions, while simultaneously seeking substantial fees from Plaintiff for related federal work, is inconsistent with the limited recovery authorized by this Court.

Plaintiff also notes the broader context of the sanctions order. While Plaintiff must respect the Court's ruling, the award of fees for a motion the Court itself described as part of a pattern of litigation activity—while denying other sanctions motions—highlights the need for strict scrutiny of the amount claimed. The Statement of Fees does not demonstrate that the time claimed was reasonable, necessary, or limited to the scope defined in ECF 287.

V. REQUESTED RELIEF

For the foregoing reasons, Plaintiff respectfully requests that the Court:

1. Deny Defendant Ilana Eddi's request for \$23,739.00 in its entirety
2. Grant such other and further relief as the Court deems just and proper.

Dated: October 15, 2026

Respectfully submitted,

Raymond Earl Butler II

/s/ Raymond E. Butler, II

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October, 2026, a true and correct copy of the foregoing Plaintiff's Objection to Defendant Ilana Eddi's Statement in Support of Fee Award was served by CM/ECF and e-mail on all parties of record by operation of the Court's electronic filing system.

Raymond Earl Butler II

/s/ Raymond E. Butler, II