

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

<b>REBEKAH KATHERINE BREWIS,</b>	)	
	)	
Plaintiff, <i>Pro Se</i> ,	)	<b>Case No. 1:25-cv-03513</b>
	)	
v.	)	Judge Sara L. Ellis
	)	
<b>PETERSON FARMS FRESH, LLC;</b>	)	Magistrate Judge
<b>AARON LEROY PETERSON,</b>	)	Daniel P. McLaughlin
<b>a/k/a R.J. ELLIOT, et al.,</b>	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR REASONABLE ACCOMMODATIONS UNDER THE  
AMERICANS WITH DISABILITIES ACT**

**I. INTRODUCTION**

1. Plaintiff Rebekah Katherine Brewis, proceeding *pro se*, respectfully requests that this Court grant reasonable accommodations for her documented disabilities pursuant to the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.*, and this Court's inherent authority to ensure equal access to the judicial process.

2. This Court previously granted Plaintiff's ADA accommodations motion on June 12, 2025 (Dkt. #37, #38). Plaintiff now renews this request in connection with her concurrently-filed Rule 60(b) motion and related proceedings, and requests that the Court's prior accommodations order remain in effect throughout the pendency of this litigation.

## II. PLAINTIFF'S DISABILITIES

3. Plaintiff is a neurodivergent individual with multiple documented disabilities (**Exhibits C, F**), including:

(a) Autism Spectrum Disorder (ASD); (b) Attention Deficit Hyperactivity Disorder (ADHD); (c) Complex Post-Traumatic Stress Disorder (C-PTSD) arising from trafficking-related trauma; (d) HIV-positive status, which compounds Plaintiff's immunological vulnerability and requires ongoing medical management; (e) Related conditions including severe social anxiety, emotional dysregulation, hyperarousal, and short-term memory impairment.

Plaintiff is a certified class member under the Williams v. Pritzker Consent Decree (Case No. 05-C-4673, N.D. Ill.), which mandates community-based services for individuals with serious mental illness who are at risk of institutionalization. Plaintiff's Maximus assessments and Aetna Better Health Care Management documentation (**Exhibits C, RR**) confirm her eligibility for Consent Decree services, further corroborating the severity of her disabilities.

4. On June 4, 2025, Maximus, the federal contractor administering Illinois disability determinations, conducted a comprehensive clinical assessment of Plaintiff (**Exhibit C**). The assessment documented that Plaintiff had "difficulty making safe decisions," required 24-hour supervised care, was homeless, had zero income, and met criteria for admission to a State-operated mental health facility. Plaintiff was subsequently placed at Clayton Residential (**Exhibit D**).

5. Plaintiff's disabilities substantially limit major life activities including concentrating, communicating, interacting with others, processing verbal information in real-time, and managing

stress in adversarial environments. Dr. Jacob Fryda has assessed Plaintiff as permanently disabled (**Exhibit F**).

6. Plaintiff's ASD diagnosis reflects the well-documented gender disparity in autism identification. Women with autism are systematically underdiagnosed and late-diagnosed due to gender-specific masking behaviors- the learned suppression of autistic traits to meet neurotypical social expectations. See H.R. 9338, 118th Cong. (2024) (Khanna bill addressing gender disparity in autism diagnosis). The masking that delayed Plaintiff's diagnosis also made her more vulnerable to exploitation: she presented as neurotypical to her traffickers while lacking the executive function, social pattern recognition, and threat assessment capabilities that neurotypical individuals rely upon for self-protection. This Court should consider Plaintiff's accommodations in light of this documented disparity- the very traits that make Plaintiff appear functional in brief interactions are the traits that exhaust her cognitive resources and require the accommodations requested herein.

### **III. ACCOMMODATIONS REQUESTED**

#### ***A. Extended Time for Filings and Responses***

7. Plaintiff requests extended deadlines for all filings and responses, with a presumptive extension of fourteen (14) additional days beyond standard deadlines. Plaintiff's ADHD and C-PTSD affect her ability to process complex legal documents within standard timeframes, particularly given her pro se status and the complexity of this litigation.

#### ***B. Written Communication Preference***

8. Plaintiff requests that all communications from the Court and opposing counsel be provided in writing (via CM/ECF or email) rather than by telephone. Plaintiff's autism and verbal

communication difficulties make telephone communication extremely challenging. Plaintiff has difficulty processing verbal information in real-time, experiences severe anxiety during phone calls, and cannot adequately advocate for herself in verbal exchanges.

9. This accommodation is critical given Defendants' counsel's documented pattern of insisting on telephone communications despite Plaintiff's disability (**Exhibit LL**). Defense counsel Brion B. Doyle of Varnum LLP specifically refused to concur in Plaintiff's ADA-based request for extension of time (**Exhibit NN**), forcing Plaintiff to file a contested motion for an accommodation that should have been granted by stipulation. This refusal was not a legitimate litigation tactic --- it was the deliberate exploitation of a disabled pro se litigant's vulnerabilities by sophisticated defense counsel who knew that opposing an ADA extension would impose disproportionate burden on a neurodivergent plaintiff with documented executive function impairments. The exploitation that occurred in this case was facilitated in part by Defendants' systematic refusal to honor Plaintiff's documented disability-related needs.

***C. Advance Notice of Hearings and Conferences***

10. Plaintiff requests a minimum of fourteen (14) days' advance notice for any hearings, conferences, or other proceedings requiring her attendance. Plaintiff's conditions require substantial preparation time to manage anxiety and ensure she can participate meaningfully.

***D. Permission to Participate Remotely***

11. Plaintiff requests permission to participate in hearings and conferences remotely via video or telephone when in-person attendance would create undue hardship. Plaintiff's current housing instability and financial circumstances, combined with her disabilities, make reliable in-person attendance difficult.

***E. Breaks During Extended Proceedings***

12. For any hearings or proceedings lasting longer than one hour, Plaintiff requests breaks of at least ten (10) minutes per hour to manage sensory overload, anxiety, and attention difficulties associated with her conditions.

***F. Permission to Submit Written Statements***

13. Plaintiff requests permission to submit written statements in lieu of or in addition to oral argument when she determines that her disabilities would prevent effective verbal presentation. Plaintiff's autism affects her ability to organize and deliver verbal arguments under pressure, and written communication allows her to present her positions more completely and accurately.

***G. Neurodivergent Healthcare Cost Burden***

14. Plaintiff's disabilities impose healthcare costs substantially exceeding those of the general population. Peer-reviewed research establishes that autistic adults face healthcare costs approximately double the general population, with costs increasing approximately 30% when ASD is comorbid with ADHD- Plaintiff's exact diagnostic profile. See Zerbo et al., 22 *Autism in Adulthood* 3 (2022) (PMC 8992805); Malik-Soni et al., 91 *Pediatric Research* 1028 (2022) (annual costs \$13,580 for autistic adults 18+). Plaintiff's contemporaneously filed Emergency Motion for Interim Medical Relief details the specific cost burden, including a \$2,000/month Neurodivergent Health Vulnerability Supplement to cover sensory accommodation, executive function support, occupational therapy, specialized dietary requirements, and the cumulative "neurodivergent tax" that Defendants' exploitation has rendered Plaintiff unable to self-fund. The Court's accommodations should be understood in the context of this documented cost burden - Plaintiff is

not merely inconvenienced by standard litigation procedures, she is structurally excluded from meaningful participation without the modifications requested herein.

#### **IV. LEGAL STANDARD**

15. Title II of the ADA requires public entities, including federal courts, to make reasonable modifications to policies, practices, and procedures when necessary to avoid discrimination against individuals with disabilities. 42 U.S.C. § 12131; 28 C.F.R. § 35.130(b)(7). The Seventh Circuit has recognized that courts must provide reasonable accommodations to ensure meaningful access to the judicial process. *See Jaros v. Illinois Department of Corrections*, 684 F.3d 667, 672 (7th Cir. 2012).

16. Courts have recognized that *pro se* litigants with disabilities require accommodations tailored to their individual needs. *See Tennessee v. Lane*, 541 U.S. 509, 523 (2004). The accommodations Plaintiff requests are reasonable, do not fundamentally alter the nature of the proceedings, and are necessary to ensure Plaintiff can meaningfully participate in this litigation.

#### **V. CONCLUSION**

17. For the foregoing reasons, Plaintiff respectfully requests that this Court enter an Order granting the accommodations set forth above and confirming that the accommodations previously granted on June 12, 2025 remain in effect throughout the pendency of this litigation.

Respectfully submitted,



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Rebekah Katherine Brewis

*Plaintiff, Pro Se*

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Dated: February 26, 2026

**CERTIFICATE OF SERVICE**

I, Rebekah Katherine Brewis, hereby certify that on February 26, 2026, I caused a true and correct copy of the foregoing to be served upon all counsel of record via the Court's CM/ECF electronic filing system, which will send notification of such filing to the following:



Rebekah Katherine Brewis

*Plaintiff, Pro Se*

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