

DECKETED

MAR 19 2001

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

MICHAEL WILLARD, WILLIAM
FRIERSON, ALLON CAMPBELL,
and GARY MOORE,

Plaintiffs,

v.

DONALD SNYDER, Director of
Illinois Department of
Corrections, JAMES CERVONE,
Assistant Deputy Chief, Adult
Parole/Field Operations, RICHARD
LAPIDOS, Parole Agent,

Defendants.

JUDGE KENNELLY

01C 1884

No.

MAGISTRATE JUDGE ASHMAN

JURY DEMANDED

U.S. DISTRICT COURT
03/16/01

MAR 15 PM 2:56

FILED-204

CLASS ACTION COMPLAINT FOR
INJUNCTIVE RELIEF AND DAMAGES

Now comes the Plaintiffs, MICHAEL WILLARD, WILLIAM FRIERSON,
ALLEN CAMPBELL and GARY MOORE, through their attorneys, THOMAS
PETERS, KEVIN PETERS, and ELYSE YOELIN, and states as follows:

COUNT I

PARTIES, JURISDICTION AND VENUE

1. Plaintiff Willard is a citizen of the United States and
an Illinois parolee who currently is in custody at the Big Muddy
Correctional Center.

2. Plaintiff Frierson is a citizen of the United States and
an Illinois parolee who currently is in custody at the Big Muddy

1-1

Correctional Center.

3. Plaintiff Campbell is a citizen of the United States and an Illinois parolee who currently is in custody at the Big Muddy Correctional Center.

4. Plaintiff Moore is a citizen of the United States and an Illinois parolee who is residing in Chicago, Illinois.

5. Defendant Snyder is the Director of the Illinois Department of Corrections. In that capacity, he sets the policies and practices relating to parolees and he is sued in his individual and his official capacities.

6. Defendant Cervone is the Assistant Deputy Chief of Adult Parole/Field Operations for the Illinois Department of Corrections. In that capacity, he implements the policies of Defendant Snyder and trains other IDOC employees in accordance with those policies and practices, and Cervone is sued in his individual and his official capacities.

7. Defendant Lapidos is a parole agent for the Illinois Department of Corrections. In that capacity, he worked at the Cook County Jail and was responsible for scheduling preliminary parole revocation hearings. Lapidos is sued in his individual capacity only.

8. All of the acts and omissions alleged in this complaint were made under color of state law.

9. This action is brought pursuant to 42 U.S.C. §1983 for violations of Plaintiffs' constitutional rights under the Due Process Clause of the Fourteenth Amendment.

10. All of the Defendants maintain offices and do business in or near Chicago, Illinois, and the site for all of the preliminary parole revocation hearings is Chicago, Illinois.

11. This Court has jurisdiction pursuant to 28 U.S.C. §1331, 1334 and 2201.

FACTUAL BACKGROUND

12. Michael Willard (No. B73178) was paroled from the Big Muddy Correctional Center.

13. Following his release on parole, Plaintiff Willard was assigned a parole agent in Cook County, Illinois.

14. In early January, 2001, Plaintiff Willard was arrested in Chicago for an alleged technical (non-criminal) violation of parole.

15. Plaintiff Willard denies that he had committed a parole violation at any time prior to his arrest in January, 2001.

16. Within a few hours of his arrest, Plaintiff Willard was taken to the Cook County Jail.

17. Defendant Lavidos was assigned as a parole agent to the Cook County Jail when Plaintiff Willard was arrested.

18. Defendant Lavidos' duties at that time included serving notice of parole violation charges and scheduling preliminary parole revocation hearings.

19. Defendant Lavidos did not serve Plaintiff Willard with notice of charges of the alleged parole violation.

20. Defendant Lavidos did not schedule a preliminary parole revocation hearing for Plaintiff Willard.

21. Defendant Lapidos did not secure a waiver of preliminary parole revocation hearing from Plaintiff Willard.

22. Instead, acting pursuant to the policies and practices of Defendants Snyder and Cervone, Defendant Lapidos arranged for (or allowed) Plaintiff Willard to be transferred to the Joliet Correctional Center.

23. Plaintiff Willard was transferred to the Joliet Correctional Center within a few days of his arrest.

24. Plaintiff Willard had not waived his right to a preliminary parole revocation hearing, at or near the site of the alleged violation, when he was transferred to the Joliet Correctional Center.

25. It is, and was in January of 2001, the policy and practice of Defendants (Snyder and Cervone) to return alleged parole violators to the institution from which they were paroled.

26. As a direct result of that policy of Defendants Snyder and Cervone, Plaintiff Willard was transferred from the Joliet Correctional Center to the Big Muddy Correctional Center.

27. The Big Muddy Correctional Center is located in Ina, Illinois.

28. Ina is hundreds of miles from Chicago.

29. Plaintiff Willard did not waive his constitutional right to a prompt preliminary parole revocation hearing at any time prior to his transfer from the Joliet Correctional Center to the Big Muddy Correctional Center.

30. Plaintiff Willard has been in custody for more than sixty days and he still has not had a preliminary parole

revocation hearing.

31. Plaintiff Willard has a well-established constitutional right to a prompt preliminary parole revocation hearing.

32. Plaintiff Willard has a well-established constitutional right to a preliminary parole revocation hearing near the site of the alleged parole violation.

33. Plaintiff Willard has a well-established right to counsel, to call witnesses, and to confront and cross examine witnesses at his preliminary parole revocation hearing.

34. Defendants' (Snyder, Cervone, and Lapidos) policies and practices as applied to Plaintiff Willard violated Plaintiff Willard's constitutional rights as identified in paragraph 30-33 above.

35. Defendants' policy, of shipping alleged parole violators out of the Cook County Jail to the Joliet correctional Center and then to the institution from which the parole was granted, creates a system which guarantees that no Cook County parolee will receive a prompt preliminary parole revocation hearing at or near the site of the alleged parole violation.

36. Defendants' policy, of shipping alleged parole violators out of the Cook County Jail to the Joliet correctional Center and then to the institution from which the parole was granted, creates a system which guarantees that Cook County parolees will not have counsel or favorable witnesses present when a preliminary parole revocation hearing finally is held.

37. Absent exigent circumstances, a preliminary parole revocation hearing should be held within ten (10) days of a

parolee's arrest and the hearing should be held at or near the site of the alleged violation.

Wherefore, Plaintiff Willard prays the Court will a) issue a preliminary injunction barring Defendants from continuing their policy of transferring parolees from the Cook County Jail before the parolee has had, or waived, a preliminary parole revocation hearing; b) permanently enjoining Defendants from continuing their policy as alleged herein; (c) award costs and attorney's fees.

COUNT II

1-11. Plaintiff Frierson re-alleges paragraphs 1-11 of Count I as paragraphs 1-11 of Count II.

12. Plaintiff Frierson (No. B31775) was paroled from the Big Muddy Correctional Center.

13. On or about February 11, 2001, Plaintiff Frierson was arrested for a technical (non-criminal) parole violation.

14. At the time of his arrest, Plaintiff Frierson was with his fiancée, Gloria Williams.

15. Plaintiff Frierson denies that he violated any condition of his parole on the day of his arrest or on any other day.

16. Plaintiff Frierson was not served with notice of the parole violation charges, has not waived his right to a prompt preliminary parole revocation hearing, and has not had a parole revocation hearing.

17-37. Plaintiff re-alleges paragraphs 17-37 of Count I as paragraphs 17-37 of Count II.

Wherefore, Plaintiff Frierson prays the Court will a) issue a preliminary injunction barring Defendants from continuing their policy of transferring parolees from the Cook County Jail before the parolee has had, or waived, a preliminary parole revocation hearing; b) permanently enjoining Defendants from continuing their policy as alleged herein; (c) award costs and attorney's fees.

COUNT III

1-11. Plaintiff Campbell re-alleges paragraphs 1-11 of Count I as paragraphs 1-11 of Count III.

12. Plaintiff Campbell was paroled from Big Muddy Correctional Center.

13. Following his release on parole, Plaintiff Campbell was assigned to a parole agent in Chicago, Illinois.

14. On or about February 23, 2001, Plaintiff Campbell was arrested for a technical (non-criminal) parole violation.

15. Plaintiff Campbell did not violate any of the terms or conditions of his parole prior to his arrest in Chicago, Illinois.

16. Within a few hours of his arrest, Plaintiff Campbell was transferred to the Cook County Jail.

17. Defendant Lavidos was assigned as a parole agent to the Cook County Jail when Plaintiff Campbell was arrested.

18. Defendant Lapidos' duties at that time included that he was to serve notice of parole violation charges and scheduled preliminary parole revocation hearings.

19. Defendant Lapidos did not serve Plaintiff Campbell with notice of charges of the alleged parole violators.

20. Defendant Lapidos did not schedule a preliminary parole revocation hearing for Plaintiff Campbell.

21. Defendant Lapidos did not secure a waiver of preliminary hearing from Plaintiff Campbell.

22. Instead, acting pursuant to the policies and practices of Defendants Snyder and Cervone, Defendant Lapidos arranged for (or allowed) Plaintiff Campbell to be transferred to the Joliet Correctional Center.

23-37. Plaintiff Campbell re-alleges paragraphs 23-37 of Count I as paragraphs 23-37 of Count III.

Wherefore, Plaintiff Campbell prays the Court will a) issue a preliminary injunction barring Defendants from continuing their policy of transferring parolees from the Cook County Jail before the parolee has had, or waived, a preliminary parole revocation hearing; b) permanently enjoining Defendants from continuing their policy as alleged herein; (c) award costs and attorney's fees.

COUNT IV

1-11. Plaintiff Moore re-alleges paragraphs 1-11 of Count I as paragraphs 1-11 of Count IV.

12. Plaintiff Moore was released on parole.

13. On or about January 1, 2001, Plaintiff Moore was arrested for a technical (non-criminal) parole violation.

14. Plaintiff Moore denies that he violated any of the terms or conditions of his parole.

15. Plaintiff Moore was taken into custody, on the parole violation charge, at the Cook County Jail.

16. He remained at the Cook County Jail for a few days and then was transferred to the Joliet Correctional Center.

17. From the Joliet Correctional Center, he was transferred to the Big Muddy Correctional Center in Ina, Illinois.

18. Plaintiff Moore was not served with notice of the parole violation charges while in the Cook County Jail or while at the Joliet Correction Center.

19. Defendant Lavidos did not serve Plaintiff Moore with notice of charges of the alleged parole violators.

20. Defendant Lavidos did not schedule a preliminary parole revocation hearing for Plaintiff Moore.

21. Defendant Lavidos did not secure a waiver of preliminary hearing from Plaintiff Moore.

22-37. Plaintiff re-alleges paragraphs 22-37 of Count I as paragraphs 22-37 of Count IV.

38. Plaintiff Moore was in custody for approximately sixty (60) days before the Prisoner Review Board held a preliminary parole revocation hearing at Big Muddy Correctional Center and ordered him released.

Wherefore, Plaintiff Moore prays the Court will a) issue a preliminary injunction barring Defendants from continuing their

policy of transferring parolees from the Cook County Jail before the parolee has had, or waived, a preliminary parole revocation hearing; b) permanently enjoining Defendants from continuing their policy as alleged herein; (c) award damages, costs and attorney's fees.

COUNT V

CLASS ACTION FOR DECLARATORY AND INJUNCTIVE RELIEF

1-37. Plaintiffs re-allege paragraphs 1-37 of Count I as paragraphs 1-37 of Count V.

38. Defendants' policies and practices have been in effect for several months.

39. The number of Cook County parolees who have been adversely affected by Defendants' policies exceeds five hundred.

40. Plaintiffs (Willard, Frierson, and Campbell) represent a class of Cook County parolees who have been or will be arrested for technical parole violations in Cook County, Illinois from June 1, 2000 to the present.

41. The class, as so defined, is too numerous to make joinder of all class members practicable.

42. Defendants have established a unified policy that affects all Cook County parolees charged with technical violations in the same way.

43. Plaintiffs' claims are typical of the claims of all class members.

44. Common issues of law and fact predominate over any minor differences in treatment.

45. Plaintiffs' counsel can fairly and adequately represent the class.

46. The constitutional rights of all class members are being violated by Defendants' systematic policies and practices as described herein.

Wherefore, Plaintiffs (Willard, Frierson, and Campbell) prays the Court will a) issue a preliminary injunction barring Defendants from continuing their policy of transferring parolees from the Cook County Jail before the parolee has had, or waived, a preliminary parole revocation hearing; b) permanently enjoining Defendants from continuing their policy as alleged herein; (c) award the Plaintiff class costs and attorney's fees.

COUNT VI

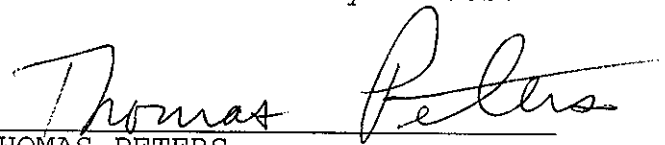
CLASS ACTION FOR DAMAGES

1-37. Plaintiff Moore re-alleges paragraphs 1-37 of Count I as paragraphs 1-37 of Count VI.

38. Plaintiff Moore represents a class of Cook Count parolees who were detained without the benefit of a prompt preliminary parole revocation and who have been, or will in the future be, found not to have violated the terms and conditions of their parole.

39-46. Plaintiff Moore re-alleges paragraphs 39-46 of Count V as paragraphs 39-46 of Count VI.

Wherefore, Plaintiff Moore prays the Court will award him and the class he represents damages, costs and attorney's fees.



THOMAS PETERS
KEVIN PETERS
ELYSE YOELIN
ATTORNEYS FOR PLAINTIFFS
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Chicago, IL 60605
312-697-0022

JS 44
(Rev. 12/96)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Michael Willard, et. al.

01C 1884

JUDGE KENNELLY

DEFENDANTS

Donald Snyder, et. al.

U.S. DISTRICT COURT
FILED-COA
01 MAR 16 PM

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Cook

(EXCEPT IN U.S. PLAINTIFF CASES)
MAGISTRATE JUDGE ASHMAN

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Cook

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Thomas Peters
Kevin Peters and Elyse Yoelin
542 S. Dearborn St. #750
Chicago, IL 60605 (312) 697-0022

ATTORNEYS (IF KNOWN)

James Ryan
Attorney General
100 W. Randolph, 12th Floor
Chicago, IL 60601

MAR 19 2001

II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|--------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 6 | <input type="checkbox"/> |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 8 | <input type="checkbox"/> |

IV. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 180 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/CC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice Act <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R R & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl Ret Inc. Security Act	

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

42 U.S.C. 1983 Parolee Due Process Violations

VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint

JURY DEMAND: YES NO

VIII. This case is not a refiling of a previously dismissed action. is a refiling of case number _____, previously dismissed by Judge _____

DATE

3/16/01

SIGNATURE OF ATTORNEY OF RECORD

Thomas Peters

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. DISTRICT COURT
FILED-EOJ
MAR 16 PM 2:56
MAR 19 2001

In the Matter of Willard, et. al. v. Snyder, et. al.

JUDGE KENNEL Case Number:
MAGISTRATE JUDGE ASHMAN **01C 1884**

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:
Michael Willard, Allon Campbell, Gary Moore, and William Frierson

(A)		(B)	
SIGNATURE <i>Thomas Peters</i>		SIGNATURE <i>Kevin Peters</i>	
NAME THOMAS PETERS		NAME KEVIN PETERS	
FIRM		FIRM	
STREET ADDRESS 542 S. DEARBORN ST., #750		STREET ADDRESS 542 S. DEARBORN ST., #750	
CITY/STATE/ZIP CHICAGO, ILLINOIS 60605		CITY/STATE/ZIP CHICAGO, ILLINOIS 60605	
TELEPHONE NUMBER (312) 697-0022		TELEPHONE NUMBER (312) 697-0022	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 02183587		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06184460	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE <i>Elyse A. Yoelin</i>		SIGNATURE	
NAME Elyse A. Yoelin		NAME	
FIRM		FIRM	
STREET ADDRESS 542 S. Dearborn St., #750		STREET ADDRESS	
CITY/STATE/ZIP Chicago, IL 60605		CITY/STATE/ZIP	
TELEPHONE NUMBER 312-697-0022		TELEPHONE NUMBER	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6273283		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
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TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

PLEASE COMPLETE IN ACCORDANCE WITH INSTRUCTIONS ON REVERSE.

1-3