



## E-Notice

**2015-CH-11292**

CALENDAR: 16

To: Matthew Vincent Topic  
matt@loevy.com

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# NOTICE OF ELECTRONIC FILING

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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

**PRISON LEGAL NEWS vs. ILL. DEPT. OF CORRECTIONS  
2015-CH-11292**

The transmission was received on 07/27/2015 at 6:53 AM and was ACCEPTED with the Clerk of the Circuit Court of Cook County on 07/27/2015 at 8:37 AM.

**CHANCERY\_ACTION\_COVER\_SHEET (CHANCERY DIVISION)**

**COMPLAINT**

Filer's Email: matt@loevy.com  
Filer's Fax: (312) 243-5902  
Notice Date: 7/27/2015 8:37:33 AM  
Total Pages: 15

**DOROTHY BROWN  
CLERK OF THE CIRCUIT COURT  
COOK COUNTY  
RICHARD J. DALEY CENTER, ROOM 1001  
CHICAGO, IL 60602**

(312) 603-5031  
courtclerk@cookcountycourt.com

IN THE CIRCUIT CIVIL COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, COUNTY DIVISION

PRISON LEGAL NEWS
v.
ILL. DEPT. OF CORRECTIONS
Plaintiff
Defendant



No.

ELECTRONICALLY FILED
7/27/2015 8:30 AM
2015-CH-11292
CALENDAR: 16
CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
CHANCERY DIVISION
CLERK DOROTHY BROWN

CHANCERY DIVISION CIVIL COVER SHEET
GENERAL CHANCERY SECTION

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the line in front of the appropriate category which best characterizes your action being filed.

- 0005 [ ] Administrative Review
0001 [ ] Class Action
0002 [ ] Declaratory Judgment
0004 [ ] Injunction

- 0007 [x] General Chancery
0010 [ ] Accounting
0011 [ ] Arbitration
0012 [ ] Certiorari
0013 [ ] Dissolution of Corporation
0014 [ ] Dissolution of Partnership
0015 [ ] Equitable Lien
0016 [ ] Interpleader
0017 [ ] Mandamus
0018 [ ] Ne Exeat

- 0019 [ ] Partition
0020 [ ] Quiet Title
0021 [ ] Quo Warranto
0022 [ ] Redemption Rights
0023 [ ] Reformation of a Contract
0024 [ ] Rescission of a Contract
0025 [ ] Specific Performance
0026 [ ] Trust Construction
0027 [ ] Foreign Transcript
0085 [ ] Petition to Register Foreign Judgment
[ ] Other (specify) \_\_\_\_\_

By: /s MATTHEW VINCENT TOPIC
Attorney Pro Se

Atty. No.: 41295
Name: LOEVY & LOEVY
Atty. for: PRISON LEGAL NEWS
Address: 312N MAY 100
City/State/Zip: CHICAGO, IL 60607
Telephone: (312) 243-5900

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

PRISON LEGAL NEWS, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
ILLINOIS DEPT. OF CORRECTIONS, )  
 )  
Defendant. )

**COMPLAINT**

NOW COMES Plaintiff, PRISON LEGAL NEWS, by its undersigned attorneys, LOEVY & LOEVY, and brings this Freedom of Information Act suit to force Defendant ILLINOIS DEPARTMENT OF CORRECTIONS to produce information about charges for prison inmate services and how IDOC may be profiting from them. The information is of significant public interest and PLN intends to use the information to expose IDOC’s practices and to advocate for reform before the Federal Communications Commission during ongoing rulemaking. This public interest substantially outweighs the alleged “burden” on IDOC to collect and produce this information. In support of its Complaint, PLN alleges:

**INTRODUCTION**

1. Pursuant to the fundamental philosophy of the American constitutional form of government, it is the public policy of the State of Illinois that all persons are entitled to full and complete information regarding the affairs of government and the official acts and policies of those who represent them as public officials and public employees consistent with the terms of the Illinois Freedom of Information Act (“FOIA”). 5 ILCS 140/1.

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2. All public records of a public body are presumed to be open to inspection or copying. Any public body that asserts that a record is exempt from disclosure has the burden of proving by clear and convincing evidence that it is exempt. 5 ILCS 140/1.2.

3. While public bodies may deny requests deemed “unduly burdensome,” the burden of compliance must outweigh the public interest in disclosure. 3 ILCS 140/3(g).

4. ILLINOIS DEPARTMENT OF CORRECTIONS has violated FOIA by claiming that records showing the costs for inmate services and the extent to which IDOC profits from them is insufficiently important to require IDOC to look for and produce a modest number of responsive records.

5. Upon information and belief, IDOC has denied PLN’s requests not because of the alleged burden but because IDOC knows that PLN will use the information to expose profiteering at the expense of the incarcerated and their families.

**PARTIES**

6. Plaintiff PRISON LEGAL NEWS is a project of the Human Rights Defense Center, a not-for-profit, Washington charitable corporation under IRS Code § 501(c)(3), with offices in Lake Worth, Florida. PLN publishes Prison Legal News, a monthly journal of prison news and analysis. Among other activities, PLN investigates exploitation of inmates and their families by jails and prisons, publicizes its findings, and advocates for reform.

7. Defendant ILLINOIS DEPARTMENT OF CORRECTIONS is an Illinois public body with offices in Chicago, IL.

**BACKGROUND**

8. A large and lucrative industry exists for the provision of essential services to inmates, including telephone services, video visitation, electronic messaging, funds transfer, commissary, book ordering, and others.

9. Despite the well-documented importance of inmates maintaining relationships with the outside world, *see, e.g., Procunier v. Martinez*, 416 U.S. 396, 412-13 (1974), and despite the fact that most inmates and their families are of limited means, the rates for these key services that are charged to inmates and their families are too often exorbitant.

10. While IDOC is hiding its current rate information, data PLN obtained in 2013 showed that IDOC had among the highest phone rates in the country.

11. Jails and prisons frequently receive a portion of the proceeds collected from inmates and their families from the service providers (who are selected by the prisons and jails).

12. In 2011, PLN co-founded the national Campaign for Prison Phone Justice. In 2013, the Minority Media and Telecommunications Council awarded the Campaign its Digital Pioneer for Social Justice Award.

13. PLN uses inmate service data to support its public education and advocacy efforts. For example, PLN champions for state and federal policies that would rein in the exorbitant phone rates that prisons charge many inmates. In July 2014, PLN staff provided data and testimony at a Federal Communications Commission workshop about capping prison phone rates and related issues. Months later, the FCC ordered a number of prison phone service reforms. The national news media have reported on PLN's work in this area dozens of times in recent years, including USA Today, The Washington Post, the Los Angeles Times, Rolling Stone, The Seattle Times, the Tennessean and various online and broadcast reports.

14. PLN routinely seeks and receives from other departments of correction exactly the information sought in the requests at issue here.

15. PLN will use the information obtained through the requests to educate the public about this issue and to advocate before the FCC and elsewhere.

## PLN'S FOIA REQUESTS AND IDOC'S IMPROPER DENIALS

16. On March 27, 2015, PLN made 24 FOIA requests to IDOC seeking contracts, payments from services providers to IDOC, and rate and fee information for various services provided to inmates and their families. A true and correct copy of the requests is attached as Exhibit A.

17. On April 6, 2015, IDOC asserted, under FOIA Section 3(g), that the requests were unduly burdensome. A true and correct copy of the response is attached as Exhibit B.

18. On June 15, 2015, PLN responded to IDOC's undue burden claim, explaining that: (1) each of the 24 requests must be separately considered, contrary to IDOC's aggregation of the requests; (2) none of the requests are categorical, and so Section 3(g) is inapplicable; (3) all of the records pertain to the receipt or use of public funds and therefore are *per se* non-exempt under FOIA; (4) the requests were not nearly as broad as IDOC claimed; and (5) the public interest in disclosure (which was completely ignored in IDOC's undue burden assertion) is substantial and outweighs the burden of production, but in any event, PLN would agree to give IDOC 30 days to produce the records instead of the statutorily required five days. A true and correct copy of PLN's response is attached as Exhibit C.

19. After IDOC failed to respond to PLN's June 15 email, PLN contacted IDOC's Legal Counsel on July 23, 2015, in hopes of resolving the requests. Less than 40 minutes later, IDOC replied, stating: "I disagree with your assessment of 3(g) and I decline your request to reconsider." A true and correct copy of the email exchange is included in Exhibit C.

### COUNT I – VIOLATION OF FOIA BY IDOC

20. The above paragraphs are incorporated by reference.
21. ILLINOIS DEPARTMENT OF CORRECTIONS is a public body under FOIA.
22. The requested records are public records of IDOC.

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23. IDOC has refused to produce the requested records on the basis of undue burden.

24. Production of the records is not unduly burdensome.

25. IDOC has willfully and intentionally violated FOIA at least for the reasons that, (1) upon information and belief, IDOC refuses to produce the records because it fears negative press or adverse regulatory action, not because it would truly be unduly burdensome, and (2) IDOC's undue burden claim is objectively unreasonable and lacks any good faith legal basis.

**WHEREFORE**, PLN asks that the Court:

- i. in accordance with FOIA Section 11(f), afford this case precedence on the Court's docket except as to causes the Court considers to be of greater importance, assign this case for hearing and trial at the earliest practicable date, and expedite this case in every way;
- ii. declare that IDOC has violated FOIA;
- iii. order IDOC to produce the requested records;
- iv. enjoin IDOC from withholding non-exempt public records under FOIA;
- v. order IDOC to pay civil penalties;
- vi. award PLN reasonable attorneys' fees and costs;
- vii. award such other relief the Court considers appropriate.

RESPECTFULLY SUBMITTED,



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Attorneys for Plaintiff  
PRISON LEGAL NEWS

Matthew Topic

LOEVY & LOEVY  
312 North May St., Suite 100  
Chicago, IL 60607  
312-243-5900  
matt@loevy.com  
Atty. No. 41295

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# Human Rights Defense Center

DEDICATED TO PROTECTING HUMAN RIGHTS

March 27, 2015

Lisa Weitekamp  
Freedom of Information Officer  
Illinois Department of Corrections  
1301 Concordia Court  
P.O. Box 19277  
Springfield, IL 62794-9277

**Re: Illinois Freedom of Information Act Request**

As editor of the monthly journal *Prison Legal News*, a project of the nonprofit Human Rights Defense Center, I am requesting, pursuant to Illinois Freedom of Information Act, § 5 ILCS 140/1 et seq., copies of the following documents:

1. All contracts or other agreements, including all exhibits, addenda and extensions, between the Illinois Department of Corrections (IDOC) and any provider of telephone services for use by prisoners or other detainees that have been in effect at any time from January 1, 2013 to present.
2. Documents detailing all payments made to or on behalf of IDOC from or on behalf of any telephone service provider from January 1, 2013 to present.
3. Documents detailing rates for telephone calls made by prisoners or other detainees of IDOC that have been in effect at any time from January 1, 2013 to present.
4. Documents detailing all fees related to use of telephone services by the prisoners or other detainees of IDOC that have been in effect at any time from January 1, 2013 to present. This request specifically includes all ancillary fees incurred by people who accept calls from prisoners or other detainees, including any fees related to prepaid phone accounts.
5. All contracts or other agreements, including exhibits, addenda and extensions, between IDOC and any provider of video visitation services that have been in effect at any time from January 1, 2010 to present.
6. Records detailing all payments made to or on behalf of IDOC from or on behalf of any video visitation provider from January 1, 2010 to present.
7. Documents detailing rates for video visitation services at IDOC that have been in effect at any time from January 1, 2010 to present.

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P.O. Box 1151  
Lake Worth, FL 33460  
Phone: 561.360.2523 Fax: 866.735.7136  
pwright@prisonlegalnews.org

Exhibit A

8. Documents detailing all fees related to video visitation services at IDOC facilities that have been in effect at any time from January 1, 2010 present.
9. All contracts or other agreements, including exhibits, addenda and extensions, between IDOC and any provider of email or electronic messaging services for use by prisoners or other detainees that have been in effect at any time from January 1, 2010 to present.
10. Records detailing all payments made to or on behalf of IDOC from or on behalf of any provider of email or electronic messaging services for use by prisoners or other detainees from January 1, 2010 to present.
11. Documents detailing rates email or electronic messaging services for use by prisoners or other detainees at facilities operated by IDOC that have been in effect at any time from January 1, 2010 to present.
12. Documents detailing all ancillary fees related to email or electronic messaging services for use by prisoners or other detainees at facilities operated by IDOC that have been in effect at any time from January 1, 2010 present.
13. All contracts or other agreements, including exhibits, addendums and extensions, between IDOC and any provider of services used to transfer funds to people upon their release from incarceration by IDOC, that have been in effect at any time from January 1, 2010 to present.
14. Records detailing all payments made to or on behalf of IDOC from or on behalf of any provider of services used to transfer funds to people upon their release from incarceration by IDOC from January 1, 2010 to present.
15. Documents detailing all ancillary fees related to the transfer of funds to people upon their release from incarceration by IDOC, including but not limited to all cardholder agreements that have been in effect at any time from January 1, 2010 to present.
16. All contracts or other agreements, including exhibits, addenda and extensions, between IDOC and any provider of money transfer services, including but not limited to any services whereby members of the public can send money to prisoners or other detainees for placement on their institutional accounts, that have been in effect at any time from January 1, 2010 to present.
17. Records detailing all payments made to or on behalf of IDOC from or on behalf of any money transfer services provider from January 1, 2010 to present.
18. Documents detailing all ancillary fees related to money transfer services, including but not limited to fees charged to send money to prisoners or other detainees for placement on their institutional accounts that have been in effect at any time from January 1, 2010 to present.

19. All contracts or other agreements, including exhibits, addenda and extensions, between IDOC and any provider of institutional commissary or canteen services that have been in effect at any time from January 1, 2010 to present.
20. Records detailing all payments made to or on behalf of IDOC from or on behalf of any institutional commissary or canteen services provider from January 1, 2010 to present.
21. All contracts or other agreements, including exhibits, addenda and extensions, between IDOC and any provider of prisoner package services (i.e., services that allow prisoners or other detainees to order goods from private companies, such as Union Supply, Access, Jack L. Marcus Company, etc.), that have been in effect at any time from January 1, 2010 to present.
22. Records detailing all payments made to or on behalf of IDOC from or on behalf of any prisoner package services provider from January 1, 2010 to present.
23. All contracts or other agreements, including exhibits, addenda and extensions, between IDOC and any provider of book ordering services used by prisoners or other detainees in effect at any time from January 1, 2010 to present.
24. Records detailing all payments made to or on behalf of IDOC from or on behalf of any provider of book ordering services for prisoners or other detainees from January 1, 2010 to present.

I request that the above-described public records be provided in electronic format, via email, if they exist in or can be converted to electronic format.

If you claim that any of the requested records are not a public record, or you claim a privilege not to disclose any record, please respond by identifying any such records and explaining your claim that it is not a public record or why it is privileged or confidential or otherwise exempt, in accordance with § 5 ILCS 140/9. Please produce all records for which you do not claim an exemption or privilege.

In accordance with § 5 ILCS 140/7, if you claim that any portion of any record is exempt, please redact that portion of the record that you believe is exempt and provide both the statutory citation to any exemption you believe is applicable and the specific reasons for your conclusion that the redacted portion of the record is exempt from disclosure and produce the remainder of the record(s).

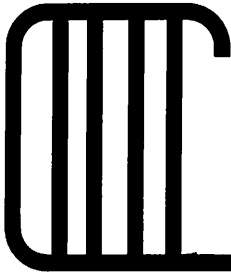
The use of these records by our non-profit organization is likely to contribute significantly to a public understanding of the operations of IDOC and their disclosure is clearly in the public interest. Accordingly, we request a waiver of all fees for this request. Please email all records responsive to this request to Ryan Barrett: [rbarrett@prisonlegalnews.org](mailto:rbarrett@prisonlegalnews.org). I look forward to your prompt reply.

Sincerely,



Paul Wright  
Executive Director, HRDC

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**Illinois**  
**Department of**  
**Corrections**

**Bruce Rauner**  
Governor

**Donald Stolworthy**  
Director

1301 Concordia Court • P.O. Box 19277  
Springfield IL 62794-9277

Telephone: (217) 558-2200  
TDD: (800) 526-0844

April 6, 2015

Paul Wright  
P.O. Box 1151  
Lake Worth, Fl. 33460

**Re: Freedom of Information Act Request 150403046**

Dear Mr. Wright:

This is in response to your request to the Illinois Department of Corrections (“IDOC”) for information pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq.

You have requested many different documents as part of your 24-part request. The subject matter of the various request are very diverse and said records are kept in several different locations. The documents would need to be obtained from dozens of different units within IDOC.

Your request is unduly burdensome. Please limit your request to manageable proportions. Once we receive your refined request, we will be better able to determine if we can provide documents responsive to your request [5 ILCS 140/3(g)].

Please submit your refined request, using the above-referenced FOIA number.

Sincerely,

Millicent Bliesener  
Office Associate  
Freedom of Information Office

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Exhibit B

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**RE: FOIA 150403046**

1 message

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**Diers, Joel M.** <JOEL.DIERS@doc.illinois.gov>

Thu, Jul 23, 2015 at 2:13 PM

To: Matt Topic <matt@loevy.com>, "Foreman, Jennifer" <Jennifer.Foreman@doc.illinois.gov>, "Ford, Delbert" <Delbert.Ford@doc.illinois.gov>

Cc: Caroline Hirst <caroline@loevy.com>

I disagree with your assessment of 3(g) and I decline your request to reconsider.

Thank You

Joel M. Diers

Legal Counsel

Illinois Department of Corrections

(312) 558-2200 x 4110

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**From:** Matt Topic [mailto:matt@loevy.com]

**Sent:** Thursday, July 23, 2015 1:36 PM

**To:** Foreman, Jennifer; Diers, Joel M.; Ford, Delbert

**Cc:** Caroline Hirst

**Subject:** Fwd: FOIA 150403046

I did not receive a response to the below email, nor a bounce-back message. Either way, please get back to me in the next five business days.

**Matthew Topic**

**Loevy & Loevy**

312 N. May Street, Suite 100

Chicago, IL 60607

312-789-4973 (office)

773-368-8812 (cell)

Exhibit C

The sender of this email is an attorney. The information contained in this communication is confidential, may be attorney-client privileged, may be attorney work product, and is intended only for the use of the addressee. It is the property of the sender. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify me immediately by return e-mail, and destroy this communication and all copies thereof, including all attachments.

----- Forwarded message -----

From: **Matt Topic** <[matt@loevy.com](mailto:matt@loevy.com)>

Date: Mon, Jun 15, 2015 at 11:26 AM

Subject: FOIA 150403046

To: [Lisa.weitekamp@doc.illinois.gov](mailto:Lisa.weitekamp@doc.illinois.gov)

Cc: Caroline Hirst <[caroline@loevy.com](mailto:caroline@loevy.com)>, paul wright <[pwright@prisonlegalnews.org](mailto:pwright@prisonlegalnews.org)>

Dear FOIA Officer:

I represent Paul Wright and Prison Legal News, a project of the nonprofit Human Rights Defense Center, in connection with the attached FOIA request. Please direct all future correspondence on this matter to me. We disagree that the requests are unduly burdensome and ask you to reconsider.

We disagree that IDOC may aggregate the 24 requests together in determining whether the request is unduly burdensome. Each of the 24 requests must be separately considered. Further, none of the requests call for all records falling within a category, but rather, seek discrete records. As such, Section 3(g) cannot apply. And regardless, the requested records all pertain to the receipt, obligation, and/or use of public funds, and therefore are subject to disclosure without exception. 5 ILCS 140/2.5; Ill. Const. Art. VIII, Sec. 1(c).

It also appears that you are misconstruing the requests. As should be clear from the requests, we seek, for telephone services, video visitation, electronic mail, fund transfers, commissary, package services, and book ordering, the following records: contracts, records showing the payments received by IDOC from the providers, records showing the rates, and records showing the fees. The requests do not seek every record related to these contracts or services, but only these narrow and discrete records. The requests can likely be satisfied by producing the contract documents, financial records showing payments from the providers to IDOC, and policies or similar documents showing the rates and fees. We have obtained this information many many other state DOCs without incident and have received similar information from IDOC in the past.

Finally, Section 3(g) applies only if the burden outweighs the public interest in disclosure and your response fails to address the public interest. There is a significant public interest in evaluating these issues as part of a local and national debate that outweighs any burden.

We ask that IDOC reconsider its position and let me know either way in the next five business days. We are willing to grant IDOC 30 calendar days from today to produce the records if it commits to doing so within the next five business days. Please email me any time with questions or to set up a time to talk, if needed. Please conduct all communications on this requests through email and not the mail.

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Thank you,

**Matthew Topic**

**Loevy & Loevy**

312 N. May Street, Suite 100

Chicago, IL 60607

[312-789-4973](tel:312-789-4973) (office)

[773-368-8812](tel:773-368-8812) (cell)

[matt@loevy.com](mailto:matt@loevy.com)

The sender of this email is an attorney. The information contained in this communication is confidential, may be attorney-client privileged, may be attorney work product, and is intended only for the use of the addressee. It is the property of the sender. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify me immediately by return e-mail, and destroy this communication and all copies thereof, including all attachments.

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2120 - Served  
2220 - Not Served  
2320 - Served By Mail  
2420 - Served By Publication

2121 - Served  
2221 - Not Served  
2321 - Served By Mail  
2421 - Served By Publication

SUMMONS

ALIAS - SUMMONS

(2/18/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

PRISON LEGAL NEWS

(Name all parties)

v.

ILL. DEPT. OF CORRECTIONS

No. 2015-CH-11292

Defendant Address:

ILL. DEPT. OF CORRECTIONS  
100 W. RANDOLPH  
JAMES THOMPSON CENTER  
CHICAGO, IL 60601

Summons

To each Defendant:  SUMMONS

ALIAS - SUMMONS

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

Richard J. Daley Center, 50 W. Washington, Room 802, Chicago, Illinois 60602

District 2 - Skokie  
5600 Old Orchard Rd.  
Skokie, IL 60077

District 3 - Rolling Meadows  
2121 Euclid  
Rolling Meadows, IL 60008

District 4 - Maywood  
1500 Maybrook Ave.  
Maywood, IL 60153

District 5 - Bridgeview  
10220 S. 76th Ave.  
Bridgeview, IL 60455

District 6 - Markham  
16501 S. Kedzie Pkwy.  
Markham, IL 60426

Child Support  
28 North Clark St., Room 200  
Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

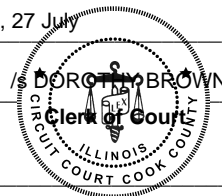
IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 41295  
Name: LOEVY & LOEVY  
Atty. for: PRISON LEGAL NEWS  
Address: 312N MAY 100  
City/State/Zip: CHICAGO, IL 60607  
Telephone: (312) 243-5900

WITNESS, Monday, 27 July, 2015



Date of service: \_\_\_\_\_

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at: \_\_\_\_\_  
(Area Code) (Facsimile Telephone Number)

# Chancery DIVISION

## Litigant List

Printed on 07/27/2015

Case Number: 2015-CH-11292

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### Plaintiffs

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Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
PRISON LEGAL NEWS				

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Total Plaintiffs: 1

### Defendants

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Defendant Name	Defendant Address	State	Zip	Unit #	Service By
ILL. DEPT. OF CORRECTIONS	100 W. RANDOLPH CHICAGO,	IL	60601	JAMES	Sheriff-Clerk

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Total Defendants: 1