

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

STEVEN DANIEL ANDERSON,)
CHARLES J. HOLLEY, JACK L. HICKMAN,)
RALPH E. CINTRON, and)
DARRYL P. BAKER,)

Petitioners-Objectors,)

v.)

Case No. 2024COEL000013

DONALD J. TRUMP, the ILLINOIS)
STATE BOARD OF ELECTIONS sitting as)
the State Officers Electoral Board, and its)
Members CASSANDRA B. WATSON,)
LAURA K. DONAHUE,)
JENNIFER M. BALLARD CROFT,)
CRISTINA D. CRAY, TONYA L. GENOVESE)
CATHERINE S. MCCRORY,)
RICK S. TERVIN, SR., and JACK VRETT,)

Respondents.)

**MOTION FOR EXPEDITED CONSIDERATION
OF PETITION FOR JUDICIAL REVIEW**

Petitioners-Objectors Steven Daniel Anderson, Charles J. Holley, Jack L. Hickman, Ralph E. Cintron, and Darryl P. Baker (“Objectors”) hereby file this Motion to Expedite Consideration of Petition for Judicial Review, and in support thereof, state as follows:

1. On January 4, 2024, Respondent-Candidate Donald J. Trump (“Candidate”) filed nomination papers to appear on the ballot in the March 19, 2024 General Primary Election as a candidate for the Republican Nomination for the Office of President of the United States.

2. That same day, Objectors timely filed their petition objecting to the validity of Candidate’s nomination papers on the basis that Candidate is disqualified from holding the Office of the President of the United States under Section 3 of the Fourteenth Amendment of the United States Constitution for having “engaged in insurrection or rebellion against the [United States

Constitution], or given aid or comfort to the enemies thereof” after having sworn an oath to support the Constitution.

3. On January 30, 2024, Respondent Illinois State Board of Elections, convening as the State Officers Electoral Board, voted to dismiss Objectors’ Petition.

4. That same day, Objectors filed a Petition for Judicial Review and forwarded a file-stamped copy of the Petition to counsel for the Illinois State Board of Elections and counsel for Candidate.

5. On that same day, January 30, 2024, Objectors caused the Petition for Judicial Review to be served on all Respondents via certified mail.

6. On that same day, Objectors filed a Proof of Service of the Petition for Judicial Review, accompanying this motion.

7. February 2, 2024 is the deadline for election authorities to have sufficient ballots printed and available to mail to military and overseas voters. 10 ILCS 5/7-16, 16-5.01.

8. February 8, 2024 is the first day for an election authority to mail a ballot to vote-by-mail voters, and the first day for early voting at the office of the election authority. 10 ILCS 5/19-4; 10 ILCS 5/19A-15.

9. Accordingly, Objectors request that the Court expedite this matter in order to avoid any prejudice to Objectors or disruption of the election process for Illinois election authorities and Illinois voters.

10. Given the matters of significant public interest at issue in this case, it is highly likely that the case will ultimately be resolved by the Illinois Supreme Court. Thus, a prompt ruling from this Court, to allow sufficient time for further appellate review in advance of the looming ballot deadlines, is of the utmost importance.

11. With the urgent need for prompt resolution in mind, Objectors propose the following expedited schedule:

- a. Objectors and Respondents shall have until February 2, 2024 to file briefs on the merits of the Electoral Board's decision.
- b. The parties shall appear before the Court on February 5, 2024, as the Court's schedule allows, for a hearing and oral argument.

WHEREFORE, Objectors respectfully request that the Court: (1) establish the expedited briefing schedule proposed above; (2) order the State Board of Elections to transmit the record of proceedings to this Court promptly; (3) set an expedited date for hearing on the Petition for Judicial Review as proposed above; and (4) grant any other relief the Court deems appropriate.

Dated: January 30, 2024

PETITIONERS-OBJECTORS

By: /s/ Ed Mullen
One of their Attorneys

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