Hearing Date: 1/11/2027 10:00 AM
Location: Court Room 2410
Judge: Sullivan, William B

FILED
11/10/2026 10:55 AM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026CH10941
Calendar, 15
40909913

FILED DATE: 11/10/2026 10:55 AM 2026CH10941

Chancery Division Civil Cover Sheet
General Chancery Section **(12/01/24) CCCH 0623**

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

ARJUN GERALD RAMACHANDRAN
Plaintiff

v.

CHICAGO POLICE DEPARTMENT
Defendant

Case No: 2026CH10941

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 box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

0005		Administrative Review
0001		Class Action
0002		Declaratory Judgment
0004	✔	Injunction
0007		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
0050		Internet Take Down Action (Compromising Images)

Other (specify) _____

Atty. No.: _____ • Pro Se 99500

Atty Name: ARJUN GERALD RAMACHANDRAN

Atty. for: Self / Plaintiff Pro Se

Address: 655 W. Irving Park Rd #614

City: Chicago State: IL

Zip: 60613

Telephone: 3126188010

Primary Email: arjun@ramachandran.xyz

Pro Se Only: ✔ I have read and agree to the terms of the Clerk's Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

Email: arjun@ramachandran.xyz

Filer Selected Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

For updated information about your case, including hearings, subsequent filings and other case information, please visit our Online Case Search and search for your case: https://casesearch.cookcountyclerkofcourt.org

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COMPLAINT OR PETITION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

This form starts a civil case.

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11/10/2026 10:55 AM
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CIRCUIT CLERK
COOK COUNTY, IL
2026CH10941
Calendar, 15
40909913

COUNTY: Cook
County Where You Are Filing the Case

PLAINTIFF/PETITIONER OR IN RE: ARJUN GERALD RAMACHANDRAN
Who is starting the case. *First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: CHICAGO POLICE DEPARTMENT
Who the case is filed against.

First, Middle, and Last Name, or Business Name

2026CH10941
Case Number
(Clerk fills in)

This general *Complaint or Petition* is used to start a civil case. See the *How To File a Complaint or Petition* instructions for more information: ilcourts.info/how-to-complaint.

A. PLAINTIFF/PETITIONER INFORMATION

The person or business starting the lawsuit is the Plaintiff/Petitioner. Add your information here.

1. I am the Plaintiff/Petitioner in this case. My name is:

   ARJUN GERALD RAMACHANDRAN.
   Your First, Middle, and Last Name, or Business Name

2. I live in this county and state:

   Cook County, Illinois.
   County & State Where You Live

B. DEFENDANT/RESPONDENT INFORMATION

The person or business you are suing is the Defendant/Respondent. Add their information here. You can list up to 3 people or businesses on this form. If you are suing more than 3 people or businesses, fill out and attach an Additional Defendant (Complaint or Petition) form.

I am suing:

Defendant: Chicago Police Department — *First, Middle, and Last Name, or Business Name*; Cook County, Illinois — *County, State Where Person Lives or Business Located*

Defendant: _____ — *First, Middle, and Last Name, or Business Name*; _____ — *County, State Where Person Lives or Business Located*

Defendant: _____ — *First, Middle, and Last Name, or Business Name*; _____ — *County, State Where Person Lives or Business Located*

☐ I am suing more than 3 people or businesses in this lawsuit. I have filled out and attached the *Additional Defendant (Complaint or Petition)* form.

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C. REASONS FOR LAWSUIT

Explain the facts and legal reasons for your lawsuit. Be specific and include names, dates, places, laws or rules that support your case, and any other important information. Use each numbered paragraph below to explain one issue or fact at a time. See the instructions for an example of how to organize your paragraphs.

If you are suing more than one Defendant/Respondent in this case, you must explain which facts and legal reasons apply to each Defendant/Respondent.

If your lawsuit is based on a written document, such as a contract, you must attach that document to this form.

1. Action under 5 ILCS 140/11(a) for injunctive relief compelling Defendant Chicago Police Department to release public records unlawfully withheld following an automatic constructive denial

2. On October 28, 2026, Plaintiff submitted a non-commercial FOIA request to CPD via its online portal and email, assigned Reference No. P239165-102826

3. The request sought disclosable public records for Dayvon Bennett (a/k/a "King Von"; DOB: 08/09/1994), prioritizing previously processed disclosure packages and arrest logs under 5 ILCS 140/3(a) and 2.15(a).

4. A true and correct copy of Plaintiff's written FOIA request and CPDs official tracking portal message history is attached as Exhibit 1

5. Under 5 ILCS 140/3(d), CPD was required to disclose records, cite Section 7 exemptions, or issue a written extension notice within 5 business days, expiring November 5, 2026

6. CPD failed to produce records, cite statutory exemptions, or issue an extension notice by November 5, 2026, constituting an automatic constructive denial as of November 6, 2026

7. Under 5 ILCS 140/1.2, records are presumed open; by failing to respond in time, CPD forfeited its right to claim "unduly burdensome" under Section 3(g) or charge fees

8. CPD's failure to comply is deliberate and without legal justification, constituting a willful and intentional violation of the Illinois FOIA under 5 ILCS 140/11(j)

☐ I need more space to explain, and I have filled out and attached an *Additional Reasons for Lawsuit* form.

☑ My lawsuit is based on a written document and I have attached a copy of that document to this *Complaint or Petition*.

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D. WHAT YOU ARE ASKING FOR

Explain what you want the judge to do. This can include ordering the Defendant/Respondent to pay you money, give back your property, or do something else.

I am asking for an order that the Defendant/Respondent: *(check all that apply)*

☐ Pay me money. The total amount of money I am asking for is ☐ under $50,000 ☐ over $50,000.

I want the following amount of money: $ _____.

If you are asking for money, you must certify the amount under Illinois Supreme Court Rule 222 by checking one of the boxes above and signing this document. You do not have to attach a separate affidavit.

☐ Return tangible personal property (items in the Defendant/Respondent's possession) to me:

_____

_____

☑ Pay the costs of this lawsuit. *(This is calculated at the end of the case)*

☑ Do something else:

Write what you want the judge to order the Defendant/Respondent to do.

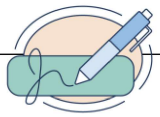
Order Defendant Chicago Police Department to immediately produce all non-exempt records responsive to FOIA Request Reference No. P239165-102826, declare Defendant committed a willful and intentional violation under 5 ILCS 140/11(j), and assess civil penalties against Defendant

If you want to request a trial with a judge and a jury (jury trial), you will also need to **fill out and file a separate *Jury Request* form**, available at ilcourts.info/jury-request.

A jury trial is not automatic. If you want a jury trial, you **must** file a *Jury Request* at the same time that you file the *Complaint or Petition*.

If you want a trial with a judge only (bench trial), do **not** file the separate *Jury Request* form.

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Case Number _____

SIGN

Under Illinois Supreme Court Rule 137, my signature means that:

1) I read the document, 2) I have been informed and believe it is true and correct, and 3) I am not filing it to cause delay or for another bad reason.

If I am asking for money damages, then I certify that my Rule 222 statement in section D is true and correct, and I understand that making a false statement is perjury and has penalties provided by law under 735 ILCS 5/1-109.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ARJUN GERALD RAMACHANDRAN Print Name ARJUN GERALD RAMACHANDRAN

☑ **I am completing this form for myself**

Phone Number 3126188010 Email (if you have one) arjun@ramachandran.xyz

Your Address 655 W. Irving Park Rd #614, Chicago, IL 60613

Street, Apt. # *City* *State* *Zip Code*

Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.

☐ **I am a lawyer completing this form on behalf of a client** (Client name): _____

Lawyer Name _____ Attorney Number _____

Lawyer Phone Number _____ Law Firm _____

Lawyer Email _____

Address _____

Street, Apt. # *City* *State* *Zip Code*



WHAT'S NEXT

FOR PERSON FILLING OUT THIS FORM:

File your completed forms with the Circuit Clerk's office in the correct county. This is usually the county where any person or business you are suing lives or where the events that led to the case took place. Find your Circuit Clerk at ilcourts.info/clerks.



Learn more about each step in the process and how to file in the instructions: ilcourts.info/how-to-complaint

After you file your *Complaint or Petition, y*ou will need to have the person you are suing served with the *Summons* and *Complaint or Petition.* Find more information on serving a *Summons* at ilcourts.info/how-to-summons.

FOR PERSON RECEIVING THIS DOCUMENT:

If you received a *Summons* with this document, review the *Summons* for information about how to respond to this lawsuit. For more information about going to court, including how to fill out and file forms, call or text **Illinois Court Help** at 833-411-1121 or go to ilcourthelp.gov.

If there are words or terms that you do not understand, **visit Illinois Legal Aid Online** at ilao.info/glossary. Find more information, resources, and the location of your local legal self-help center at ilao.info/lshc-directory

Hearing Date: 1/11/2027 10:00 AM
Location: Court Room 2410
Judge: Sullivan, William B

FILED
11/10/2026 10:55 AM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026CH10941
Calendar, 15
40909913

FILED DATE: 11/10/2026 10:55 AM 2026CH10941

EXHIBIT 1

Message History (2)

FILED DATE: 11/10/2026 10:55 AM 2026CH10941

On 10/28/2026 11:48:45 AM, Chicago Public Safety wrote:

Dear AGR:

Thank you for your interest in information from the Chicago Police Department. Your FOIA request has been received and is being processed. Your FOIA Center reference number for tracking purposes is: ***P239165-102826***

You have requested the following records: ***FREEDOM OF INFORMATION ACT REQUEST****

TO:*
Freedom of Information Officer
Chicago Police Department — Freedom of Information Section
3510 S. Michigan Ave., Unit 114
Chicago, IL 60653
Email: f`oia@chicagopolice.org`

FROM:*
King AGR ARJUN GERALD RAMACHANDRAN
655 W. Irving Park Rd #614
Chicago, IL 60613 USA
Phone: 312 618 8010
Email: `arjun@ramachandran.xyz`

***DATE:** October 28, 2026*

RE: Formal Non-Commercial FOIA Request (5 ILCS 140) — Request for Previously Processed/Fulfilled Disclosure Packages, Unreleased Case Files, Mugshots, and Disposition Records Concerning Dayvon Bennett (DOB: 08/09/1994)*

Dear Freedom of Information Officer,

Pursuant to the **Illinois Freedom of Information Act (5 ILCS 140/1 et seq.)**, I am formally requesting electronic access to public records maintained by the Chicago Police Department (CPD) concerning **Dayvon Bennett** (also known professionally as "King Von"; Date of Birth: August 9, 1994).

To streamline administrative processing and prevent any duplicate labor or redundant page-by-page

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*redaction reviews for your department, **this request is structured to prioritize pre-existing, previously redacted disclosure packages under 5 ILCS 140/8.5**.*

---

*### **1. Primary Demand: Previously Fulfilled FOIA Response Packages (5 ILCS 140/8.5)**
Pursuant to **5 ILCS 140/8.5**, if any requested files have already been processed, redacted, and released to prior requesters or media organizations, please fulfill this portion of the request by directly providing those existing digital PDF release bundles without re-initiating new line-by-line redactions:
* **Malcolm Stuckey Homicide File:** Any previously compiled and redacted FOIA release packages, supplementary detective logs, or closing summaries for the May 29, 2014 shooting incident under **CPD RD No. HX281542** (Cook County Circuit Court Case No. 14 CR 14822).
* **Gakirah "K.I." Barnes Homicide File:** Any previously released FOIA disclosure packages, detective summaries, or unsealed case records concerning the April 11, 2014 shooting incident at **6451 S. Eberhart Ave**.
* **Modell McCambry Homicide File:** Any previously released FOIA summaries or closing reports concerning the October 13, 2012 homicide naming Dayvon Bennett.
* **Central FOIA Disclosure Bundles:** Any master PDF disclosure packages archived under Dayvon Bennett's name in CPD's central FOIA system.*

---

*### **2. Secondary Demand: Unreleased Records, Booking Photos, & Disclosable History**
To the extent that additional records concerning Dayvon Bennett have not been previously compiled or disclosed, I request electronic copies of the following remaining records:
* **Booking Photos & Mugshots:** All raw digital arrest booking photos and intake mugshots held in CPD databases across all adult bookings (including Cook County Booking ID: 123203677).
* **Disclosable Arrest & Juvenile Disposition Logs:** All non-adjudicative arrest cards, law enforcement disposition logs, and disclosable incident reports concerning Dayvon Bennett from January 2011 onward (including initial juvenile detention logs).
* **General Incident Records:** All supplementary incident reports, field contact cards, Tactical Response Reports (TRRs), and gang database records/charts maintained in CPD custody pertaining to Dayvon Bennett.*

---

*### **3. Statutory Duty to Redact and Release Segregable Portions (5 ILCS 140/7(1))**
If any newly processed record contains exempt information, **5 ILCS 140/7(1)** dictates that public bodies must redact **only the specific exempt details** (such as unique personal identifiers under **5 ILCS 140/7(1)(b)**) and release all remaining segregable, non-exempt portions of the raw PDFs. Categorical withholding of entire investigative files or mugshot series is legally prohibited.*

---

*### **4. Electronic Format & Statutory Fee Exemption (\$0.00)**
* **Delivery Method:** I explicitly request that all records be delivered in **electronic PDF format** via*

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email (`arjun@ramachandran.xyz)` or direct download through the Chicago Public Records Center portal.
** **Fee Exemption (\$0.00):** Pursuant to **5 ILCS 140/6(a)** and binding Public Access Counselor (PAC) Opinion 25-013, public bodies are legally prohibited from assessing fees for disclosing electronic copies of public records when no physical recording medium is purchased.*
** **Prohibition on Labor Charges:** Pursuant to **5 ILCS 140/6(a)**, public bodies cannot charge fees for search, review, or redaction labor hours on standard non-commercial requests.*

---

*### **5. Certification of Non-Commercial Purpose**
Pursuant to **5 ILCS 140/3.1(c)**, I hereby certify that this request is made for **non-commercial, personal, and educational research purposes**. It is not submitted for commercial solicitation, sale, or resale.*

---

*### **6. Statutory Response Timeline & Rights of Review**
Under **5 ILCS 140/3(d)**, a written response to this request is required within **five (5) business days** of receipt.*

*If any part of this request is denied or withheld, **5 ILCS 140/9(a)** requires CPD to provide a written notice citing the specific statutory exemption under **5 ILCS 140/7**, a detailed factual basis for the withholding, and the names and titles of each person responsible for the denial. Please be advised that improper denials or fee assessments may be appealed to the **Illinois Attorney General's Public Access Counselor (PAC)** under **5 ILCS 140/9.5** or challenged in Circuit Court, where willful non-compliance carries statutory civil penalties of **\$2,500 to \$5,000 per violation** under **5 ILCS 140/11(j)**.*

Thank you for your attention to this matter - ARJUN GERALD RAMACHANDRAN

Chicago Police Department (CPD) responds to all public records requests in accordance with the Illinois Freedom of Information Act (FOIA), 5 ILCS 140/1 et seq. If further time is needed to assemble and copy all documents responsive to your FOIA request, we will contact you with a time estimate and a request to extend.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed. Thank you for using the Chicago FOIA Center.

To monitor the progress or update this request please log into the Chicago Public Safety Record System.

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On 10/28/2026 11:48:43 AM, AGR ARJUN GERALD RAMACHANDRAN wrote:

Request Created on Public Portal

Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, 15

FILED
11/13/2026 10:57 AM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026CH10941
Calendar, 15
40968847

FILED DATE: 11/13/2026 10:57 AM 2026CH10941

MOTION

IN THE STATE OF ILLINOIS, CIRCUIT COURT

COUNTY: Cook
County Where You Are Filing the Case

Enter the case information as it appears on your other court documents.

PLAINTIFF/PETITIONER OR IN RE: ARJUN GERALD RAMACHANDRAN
Who started the case. *First, Middle, and Last Name, or Business Name*

DEFENDANTS/RESPONDENTS: CHICAGO POLICE DEPARTMENT
Who the case was filed against.
First, Middle, and Last Name, or Business Name

2026CH10941
Case Number

1. MOTION TITLE

*Explain in a few words what you are asking the judge to do. This should match the title you write in **1** on the Notice of Court Date for Motion.*

Motion to: Partially Dismiss Claims (735 ILCS 5/2-1009(a))

2. PERSON FILING THE MOTION

Check one box. The Plaintiff/Petitioner is the person who started the case. The Defendant/Respondent is the person or business the case was filed against.

I am filing the *Motion*. I am the:

☑ Plaintiff/Petitioner ☐ Defendant/Respondent

3. MOTION

Explain what you are asking the judge to do and the reasons why the judge should agree with you.

I am asking the judge to:

Pursuant to 735 ILCS 5/2-1009(a), Plaintiff ARJUN GERALD RAMACHANDRAN moves for partial voluntary dismissal, without prejudice, of all claims in FOIA Request No. P239165-102826 and the Complaint seeking juvenile law enforcement records, arrest cards, or detention logs created prior to August 9, 2012 (when Dayvon Bennett was under age 18) under 705 ILCS 405/1-7 and 5 ILCS 140/7.5(bb). All remaining claims in Plaintiff's Complaint remain fully active, pending, and unaffected, including: 1\. Compelling the immediate 30-day production of all adult public records and pre-existing 5 ILCS 140/8.5 PDF disclosure packages requested in Section 1 of FOIA Request No. P239165-102826 (including CPD RD No. HX281542); 2\. Declaring Defendant committed a willful and intentional violation under 5 ILCS 140/11(j) pursuant to Lucy Parsons Labs v. CPD, 2026 IL App (1st) 250205; and Award legal fees.

☐ I need more room to explain, and I have filled out and attached an *Additional Page for Motion* form.

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SIGN

Under Illinois Supreme Court Rule 137, my signature means that:
1) I read the document, 2) I have been informed and believe it is true and correct, and 3) I am not filing it to cause delay or for another bad reason.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ ARJUN GERALD RAMACHANDRAN Print Name ARJUN GERALD RAMACHANDRAN

☑ **I am completing this form for myself**

Phone Number _____ Email (if you have one) arjun@ramachandran.xyz

Your Address 655 W. Irving Park Rd #614, Chicago, IL 60613
Street, Apt. # *City* *State* *Zip Code*

Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.

☐ **I am a lawyer completing this form on behalf of a client** (Client name): _____

Lawyer Name _____ Attorney Number _____

Lawyer Phone Number _____ Law Firm _____

Lawyer Email _____

Address _____
Street, Apt. # *City* *State* *Zip Code*

PROOF (EXPLANATION) OF DELIVERY

*This tells the judge how and when you will send your documents **to the other people in the case** under Rule 11. If a person in the case has a lawyer, **you must send your documents to their lawyer.** File this form with the Circuit Clerk, but do not list the Clerk below as a person you are sending your documents to.*

A. I am sending this *Proof of Delivery* and the following court documents:

Plaintiff's Motion for Partial Voluntary Dismissal of Juvenile Record Claims
Name of Documents

To: Chicago Police Department
Full Name or Law Firm Name

B. I am sending the documents:

☐ By **email** to this email address: _____

☐ Through an approved **e-filing website (EFSP)** to this email address: _____

STOP

You **must** send documents electronically (by email or through an EFSP) if you and the person you are sending documents to have an email address. If you or the person you are sending to do not have an email address, or if you have permission from the judge, you may send documents using the options below.

☑ I am sending the documents to this address:

3510 S Michigan Ave, Chicago, IL 60653-1020
Street, Apt. # *City* *State* *Zip Code*

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By *(check all that apply):*

☑ Personal hand delivery.
You can only deliver to the person, person's family member over 13 at person's residence, person's lawyer, or the lawyer's office.

☐ Mail or third-party carrier (FedEx, UPS, etc.) to the address listed above, with postage or delivery prepaid.
Location of mailbox or third-party carrier: _____
Address or Intersection *City* *State*

☐ Mail from a prison or jail: _____
Name and Address of Prison or Jail

C. The documents will be sent on: Date: 11/13/2026 Time: _____
Month, Day, Year *Include AM or PM*

☐ I am sending the document to more than 1 person and have completed an additional *Proof of Delivery* form.

SIGN

Under 735 ILCS 5/1-109, my signature means that:

1) Everything in this document is true and correct, or I have been informed or I believe it to be true and correct, and

2) I understand that making a false statement on this form is perjury and has penalties provided by law.

If you are filling out this form online, sign your name by typing it. If you are filling out this form by hand, sign and print your name.

Signature /s/ ARJUN GERALD RAMACHANDRAN Print Name ARJUN GERALD RAMACHANDRAN

☑ **I am completing this form for myself**

Phone Number _____ Email (if you have one) arjun@ramachandran.xyz

Address 655 W. Irving Park Rd #614, Chicago, IL 60613
Street, Apt. # *City* *State* *Zip Code*

Be sure to **check your email every day** so you do not miss important information, court dates, or documents from other parties.

☐ **I am a lawyer completing this form on behalf of a client** (Client name): _____

Lawyer Name _____ Attorney Number _____

Lawyer Phone Number _____ Law Firm _____

Lawyer Email _____

Address _____
Street, Apt. # *City* *State* *Zip Code*

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WHAT'S NEXT

NEXT STEP FOR PERSON FILLING OUT THIS FORM:

If you do not already have a court date for your *Motion,* you will need to get one and file a *Notice of Court Date for Motion.* When you file your *Motion*, ask the Circuit Clerk if you have to schedule a court date or if one will be scheduled automatically. In some counties, you may get the court date when you e-file. Include the court date on your *Notice.*

After you fill out your forms, file them with the Circuit Clerk's office in the county where your case is taking place. Then, send your forms to the other people in the case. Find your Circuit Clerk: ilcourts.info/clerks.



Learn more about each step in the process and how to file in our Instructions: ilcourts.info/how-to-motion.

NEXT STEP FOR PERSON RECEIVING THIS DOCUMENT:

For more information about going to court including how to fill out and file forms, call or text **Illinois Court Help** at 833-411-1121 or go to ilcourthelp.gov.

If there are any words or terms that you do not understand, please **visit Illinois Legal Aid Online** at ilao.info/glossary. You may also find more information, resources, and the location of your local legal self-help center at: ilao.info/lshc-directory.