

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

[OPPOSED] MOTION FOR RULE 11 SANCTIONS

Pursuant to Rule 11 of the Federal Rules of Civil Procedure, plaintiffs request that the Court impose a monetary sanction on defendants for the filing of its pending motion to dismiss, ECF No. 227. Grounds for this motion are set out in the attached, which was served on April 7, 2026.

The parties have agreed to a briefing schedule: Defendants to respond within 14 days and plaintiffs to reply seven days thereafter.

Respectfully submitted,

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
Joel A. Flaxman
200 S Michigan Ave
Chicago, IL 60604
(312) 427-3200
knf@kenlaw.com
an attorney for plaintiffs