

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

THIS DOCUMENT RELATES TO ALL CASES

NOTICE OF OBJECTION TO DEFENDANT CALVIN RIDGELL'S MOTION FOR CLARIFICATION, TO EXCUSE HIS IN COURT PRESENCE, AND TO CONTINUE

Coordinated Plaintiffs, by and through their counsel, provide immediate notice of their objection to Defendant Ridgell's Motion (Dkt. 638), stating as follows:

1. On September 18, 2023, Plaintiffs filed a Motion for Default Judgment and Other Sanctions Against Defendant Ridgell. (Dkt. 585 (corrected version)).
2. On September 22, 2023, Plaintiffs requested a hearing requiring the presence of Defendant Ridgell and under oath testimony from him.
3. Defendant Ridgell responded to the substantive motion, wherein Defendant Ridgell also objected to a hearing requiring their client's presence. Dkt. 597, at ¶ 20.
4. On December 12, 2023, this Court obviously considered the parties' filings and granted Plaintiff's motion for an in-person hearing, setting it for December 20, 2023. Dkt 630.
5. At 4:00 p.m. on December 18, 2023, Defendant Ridgell has now filed a new motion raising new reasons why there should be no hearing and his client should not have to appear, and raising a variety of grounds for relief.

6. Plaintiffs file this immediate response to alert the Court that it objects to every request raised in Defendant Ridgell's latest motion and that Plaintiffs wish to proceed as scheduled on December 20, 2023.

7. Should this Court want a written response, Plaintiffs can provide one by 3:00 p.m. tomorrow, December 19, 2023, upon further order of the Court.

Respectfully Submitted,

/s/ Joshua Tepfer
One of the Attorneys for Plaintiffs
Represented by Loevy & Loevy

Jon Loevy
Arthur Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
Gianna Gizzi
LOEY & LOEY
311 North Aberdeen Street,
Chicago, IL 60607
(312) 243-5900
josh@loevy.com

/s/ Joel A. Flaxman
One of the Attorneys for Plaintiffs
Represented by Kenneth N. Flaxman, P.C. in
the Coordinated Proceedings

Joel A. Flaxman
Kenneth N. Flaxman
KENNETH N. FLAXMAN P.C.
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
jaf@kenlaw.com