

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

FILED FOR DOCKETING
ED-7-
04 JUL 15 AM 9:51
CLERK
U.S. DISTRICT COURT

WILLIAM RYAN,

Plaintiff,

v.

ROGER E. WALKER, KENNETH R. BRILEY,
ROBERT CATCHINGS, SERGIO MOLINA,
and BARBARA HURT

Defendants.

JUDGE RONALD GUZMAN

040 4635

JURY TRIAL DEMANDED

COMPLAINT

MAGISTRATE JUDGE KEYS

NOW COMES Plaintiff, BILL RYAN, by his attorneys,
UPTOWN PEOPLE'S LAW CENTER, LOEVY & LOEVY, and SONNENSCHNEIN, NATH
& ROSENTHAL LLP, and complaining of Defendants, ROGER E. WALKER,
KENNETH R. BRILEY, ROBERT CATCHINGS, SERGIO MOLINA, and BARBARA
HURT, states as follows:

DOCKETED
JUL 16 2004

Introduction

1. This action is brought pursuant to 42 U.S.C. Section 1983 to redress the deprivation under color of law of Plaintiff's rights as secured by the United States Constitution.

2. Specifically, this action is brought by a publisher who has been barred by Defendants from distributing a quarterly newspaper entitled *Stateville Speaks* inside Stateville Correctional Center ("Stateville").

3. As discussed more fully below, *Stateville Speaks* is a compilation of essays, poems, and news items written by inmates of the prison. See Exhibit A. After the Defendants refused to publish the newspaper, Mr. Ryan raised private funds

171

in order to cover all costs associated with printing and distributing the newsletter. Mr. Ryan simply wishes to mail *Stateville Speaks* to prisoners within the institution, and this lawsuit has become necessary because Defendants refuse to respect his constitutional right to do so.

Jurisdiction and Venue

4. This Court has jurisdiction of the action pursuant to 28 U.S.C. §§ 1331 and 1367.

5. Venue is proper under 28 U.S.C. § 1391(b). The events giving rise to the claims asserted herein occurred within this judicial district.

The Parties

6. Plaintiff, BILL RYAN, is a 69 year-old resident of Westchester, Illinois. Recently retired, Mr. Ryan has been a tireless advocate for children's welfare over his long career. For twenty years, Mr. Ryan worked as the director of child protective services for the Illinois Department of Children and Family Services. Most recently, Mr. Ryan served as the vice-president of child welfare for the Jane Addams Hull House.

7. In recent years, Mr. Ryan has volunteered to visit and interact with inmates of the Illinois Department of Corrections (IDOC). He has become an advocate for prisoners and their need for constructive outlets while incarcerated.

8. Defendant ROGER E. WALKER, is the Director of the IDOC and is being sued in both his individual and official

capacities. As Director, Defendant Walker oversees the IDOC's entire operations.

9. Defendant KENNETH R. BRILEY is the warden of Stateville Correctional Center and is being sued in both his individual and official capacities. As warden of Stateville, Defendant Briley is responsible for administering the operation of Stateville.

10. Defendant ROBERT CATCHINGS is the assistant warden for Stateville and is being sued in both his individual and official capacities.

11. Defendant SERGIO MOLINA is the Chief of Communications for the IDOC and is being sued in both his individual and official capacities. As Chief of Communications, Defendant Molina is the spokesperson for IDOC and is responsible for communications with the general public.

12. Defendant BARBARA HURT is the administrator for the Chicago District of the IDOC and is being sued in both her individual and official capacities. The Chicago District includes Stateville Correctional Center, located in Joliet, Illinois.

Stateville Speaks

13. In the Summer of 2003, at the behest of several inmates, Mr. Ryan sponsored an essay contest, soliciting entries from inmates housed in the IDOC. The inmates were asked to compose an essay on the topic, "Who am I? What can I do to be better?"

14. Over thirty-five inmates submitted essays for the contest. A panel of journalists was convened to judge the entries, including Eric Zorn, a columnist for the Chicago Tribune, Cornelia Grumman, an editorial writer for the Chicago Tribune, Jeff Flock, at the time the Chicago Bureau Chief for CNN, and Mary Mitchell, a columnist for the Chicago Sun-Times.

15. The contest was an overwhelming success. In fact, the entries were so well-written and insightful that Mr. Ryan compiled the essays into a book entitled *Lockdown Prison Heart* published in the Summer of 2004. The authors of the essays have decided to donate any profits from the sales of the book to a fund for reconciliation between victims of violent crime and the perpetrators.

16. In the Fall of 2003, encouraged by the success of the essay contest, Mr. Ryan and one of the inmates housed in Stateville, Renaldo Hudson, discussed producing and publishing a newspaper for Stateville.

17. To that end, Mr. Ryan contacted and met with Defendant Hurt about publishing a newspaper within Stateville. Mr. Ryan was confident about gaining approval because Stateville published a similar newspaper approximately ten years ago.

18. After IDOC officials raised concerns about the cost of publishing the newspaper within Stateville, Mr. Ryan agreed to provide all of the necessary supplies and equipment. CNN agreed to donate computers for the inmates to use. Eric

Zorn, Cornelia Grumman, and Robert Hess, formerly with CNN, agreed to train the prospective journalists.

19. In December 2003, Mr. Ryan spoke with Ian Oliver, then the Chief of Operations for IDOC, who informed Mr. Ryan that his proposal to publish a newspaper in Stateville, to be titled *Stateville Speaks*, had been approved.

20. In January 2004, Mr. Ryan attempted to contact Ian Oliver to discuss plans to publish the newspaper, but was informed that Oliver was no longer working for IDOC. Mr. Ryan was referred to Defendant Molina instead.

21. When Mr. Ryan contacted Defendant Molina, he was informed that the IDOC had reversed course and now would not allow a newspaper to be published within Stateville. Defendant Molina stated that publishing a newspaper within IDOC would require additional resources from the prison in order to guard the three inmates responsible for producing *Stateville Speaks* while they were outside their cells working on the newspaper.

Further Attempts to Publish

22. Disappointed but undeterred by the IDOC's abrupt change in position, Mr. Ryan solicited donations from individuals to privately publish *Stateville Speaks*. By early March 2004 Mr. Ryan had printed and published the first run of *Stateville Speaks* outside the prison, consisting of some two hundred copies.

23. The content of *Stateville Speaks* is as varied as the men who authored it. There are entries about the evils of illicit drug use (Exhibit A "From the Editor," pages 1 and 3);

self-improvement and religion ("Every Tomorrow," page 5); sentencing reform ("Lifers," page 7); the advantages of rehabilitation through cognitive restructuring therapy ("Thought Restructuring," pages 8-9); the importance of being productive while incarcerated ("Self Improvement Activities for Inmates," page 11); a poem about an inmate's sorrow for not being a part of his daughter's life ("Daddy's Sorry," page 12); a poem about remorse ("Castaway," page 4); religion ("Encouragement in the Wilderness," page 12); and social commentary on the injustice of racial discrimination and economic inequities ("The Production of a Prisoner in 8 Easy Steps," page 14), among others.

24. None of the articles contained in *Stateville Speaks* falls within any of IDOC's criteria for prohibited material. The articles are not obscene or sexually explicit; they are not written in code and do not facilitate communication between offenders; they do not describe, depict, or encourage activity that may lead to physical violence or group disruption; they do not advocate or encourage violence, hatred, or group disruption; they do not encourage or instruct in the commission of criminal activity; they do not include sexually explicit material; and they are not detrimental to security, good order, rehabilitation, or discipline and they neither facilitate criminal activity nor are they detrimental to mental health.

25. In March 2004, Mr. Ryan delivered a copy of *Stateville Speaks* to each of the individual Defendants and to the Governor of Illinois, along with a letter addressed to Defendant

Briley informing him that Mr. Ryan would like to distribute the newspaper to Stateville inmates. The letter asked Defendant Briley to review the newspaper and to contact Mr. Ryan with any and all of his concerns. See Exhibit B (letter to Defendants).

26. After waiting two to three weeks without receiving a response from any of the Defendants, Mr. Ryan mailed copies of *Stateville Speaks* to four inmates in Stateville, with the intention of mailing copies to over 100 Stateville inmates.

IDOC's Rejection

27. On March 26, 2004, Stateville refused to deliver the newspapers and instead returned them to Mr. Ryan along with rejection slips stating that the newspapers were "unauthorized material." See Exhibit C.

28. On April 9, 2004, Defendant Molina sent a letter to Mr. Ryan, stating in its entirety:

I have been asked to respond to your letter to the Governor's Office regarding the leaving [sic] an inmate newspaper at Stateville Correctional Center.

The agency's major priorities at Stateville is [sic] the safe and secure operation of managing the Level 1 maximum security facility that houses an average daily population of about 2,700 inmates.

Please know that your concerns have been heard.

See Exhibit D.

29. After receiving this letter, Mr. Ryan retained counsel to negotiate with Stateville regarding the distribution of *Stateville Speaks*. Following a meeting with counsel for the IDOC, Plaintiff's counsel received a letter dated May 7, 2004, stating that "the edition of *Stateville Speaks* would need to be

referred to the Publication Review Committee. A decision from the committee would determine whether or not the publication would be allowed."

30. To date, despite attempts to contact counsel for Defendants, Mr. Ryan has received no further response regarding *Stateville Speaks* or the Publication Review Committee.

31. Neither Stateville nor the IDOC has a method by which Mr. Ryan can either appeal the IDOC's decision to prevent him from mailing *Stateville Speaks* to prisoners at Stateville or request a hearing on the issue.

Basis for Relief

32. All Americans, including prisoners, have a fundamental right not only to express themselves, but also to receive and consider the written expressions and opinions of others. Similarly, all Americans, including Mr. Ryan, have a fundamental right to communicate their opinions and ideas to others. Where that very basic human need entails no threat whatsoever to security or any other legitimate penological interest, it should not, and cannot, be suppressed at the callous whim of prison administrators. The First Amendment to the United States constitution demands no less.

COUNT I -- 42 U.S.C. § 1983

First Amendment Violation

33. Each of the Paragraphs in this Complaint is incorporated as if restated fully herein.

34. The First Amendment to the United States Constitution guarantees Plaintiff's right to speak and publish without unreasonable government interference.

35. As stated more fully in the preceding paragraphs, Plaintiff engaged in speech protected by the First Amendment. Defendants prohibited that speech unreasonably.

36. Moreover, the administrative code promulgated by the IDOC is unconstitutionally oppressive to free speech on its face, in that it is not content neutral, it is not narrowly tailored to serve a governmental interest, and it does not allow for ample alternative channels for expression.

37. Specifically, the administrative code includes a "catch all" provision, as follows:

A publication that may be rejected includes, but is not limited to, a publication or portion thereof that meets one of the following criteria:

...

(7) It is otherwise detrimental to security, good order, rehabilitation, or discipline or it might facilitate criminal activity or be detrimental to mental health.

20 Ill. Admin. Code § 525.230(b).

38. The criteria listed in § 525.230(b)(7) are so vague as to enable the Department to censor speech based on its content in the absence of a legitimate governmental interest. For example, the criteria does not even identify whose mental health is to be considered when banning publications under § 525.230(b)(7). Furthermore, § 525.230(b), by the phrase "but not limited to," contemplates censorship based on any other criteria

that appeals to the Department, whether constitutionally permissible or not.

39. As the only meaningful method for Mr. Ryan to communicate with over 100 prisoners at Stateville is by mail, Mr. Ryan has no meaningful alternative to communicate with prisoners at Stateville so long as defendants are able to block the distribution of *Stateville Speaks*.

40. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

41. As a result of the Defendants' unconstitutional conduct, and as a result of the vague and overly broad administrative code, Plaintiff has suffered irreparable harm.

Count II -- 42 U.S.C. § 1983

Due Process

42. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

43. Plaintiff has a right to speak to prisoners, protected by the First Amendment to the Constitution of the United States.

44. Defendant has deprived plaintiff of his right to speak to prisoners at Stateville Correctional Center.

45. IDOC has no system by which a member of the public, as opposed to an inmate of IDOC, may either appeal IDOC's refusal to distribute non-prohibited material or request a hearing on the issue.

46. On its face, the absence of a system by which a member of the public can contest IDOC's interference with his or her right to communicate with prisoners at Stateville violates the due process clause of the Fourteenth Amendment to the United States Constitution.

47. Furthermore, as applied to Plaintiff, the IDOC's regulations violate Plaintiff's due process rights by not providing him with a means by which to receive a hearing or other satisfactory process on the IDOC's denial of his request to distribute *Stateville Speaks* within Stateville.

48. As a result of the violation of his constitutional rights, Plaintiff has suffered irreparable harm.

49. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

Count III -- State Law Claim

Illinois Civil Rights Act -- 740 ILCS § 23/5(c)(2)

50. Each of the Paragraphs in this Complaint is incorporated as if restated fully herein.

51. The misconduct described above is a violation of Plaintiff's rights as secured by the Illinois Constitution.

52. Specifically, by preventing Plaintiff from circulating *Stateville Speaks* within Stateville, Defendants violated Plaintiff's right to speak, write and publish freely under Article I, Section 4 of the Illinois Constitution.

53. Moreover, by preventing Plaintiff from mailing *Stateville Speaks* to prisoners at Stateville without providing him a method by which to lodge his grievance, the Defendants violated Plaintiff's right to apply for redress of grievances under Article I, Section 5 of the Illinois Constitution.

54. In addition, by preventing Plaintiff from mailing *Stateville Speaks* to prisoners at Stateville without providing him a method by which to lodge his grievance, the Defendants violated Plaintiff's right to a remedy and justice under Article I, Section 12 of the Illinois Constitution.

55. The misconduct described in this Count was undertaken with malice, willfulness, and reckless indifference to the rights of others

56. As a result of these deprivations of Plaintiff's rights as secured by the Illinois Constitution, Plaintiff has suffered irreparable harm, including but not limited to attorneys' fees and costs, for which the Defendants are liable.

REQUEST FOR RELIEF UNDER ALL COUNTS

WHEREFORE, Plaintiff, WILLIAM RYAN, respectfully requests that this Court enter judgment in his favor and against Defendants, ROGER E. WALKER, KENNETH R. BRILEY, ROBERT CATCHINGS, SERGIO MOLINA, and BARBARA HURT, awarding compensatory damages and attorneys' fees, along with punitive damages against the Defendants in their individual capacities,

as well as injunctive and declaratory relief granting Plaintiff the right to distribute *Stateville Speaks* to inmates within Stateville Correctional Center, and any other relief this Court deems just and appropriate.

JURY DEMAND

Plaintiff, WILLIAM RYAN, hereby demands a trial by jury pursuant to Federal Rule of Civil Procedure 38(b) on all issues so triable.

RESPECTFULLY SUBMITTED,


Attorneys for Plaintiff

Alan Mills
UPTOWN PEOPLE'S LAW CENTER
4404 North Broadway
Chicago, IL 60640
(773) 769-1411

Arthur Loevy
Jon Loevy
Russell Ainsworth
LOEVY & LOEVY
312 North May St
Suite 100
Chicago, IL 60607
(312) 243-5900

Samuel Fifer
Terry Norton
Carin Riekes
SONNENSCHNEIN, NATH & ROSENTHAL LLP
8000 Sears Tower
Chicago, IL 60606

JUDGE RONALD GUZMAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Civil Cover Sheet

04C 4635

MAGISTRATE JUDGE KEYS

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): William Ryan

Defendant(s): Roger E. Walker, Kenneth R. Briley, Robert Catchings, Sergio Molina, and Barbara Hurt

County of Residence: Cook

County of Residence:

Plaintiff's Atty: Loevy & Loevy
312 N. May St., Suite 100
Chicago, IL 60607
(312) 243-5900

Defendant's Atty:

II. Basis of Jurisdiction: 3. Federal Question (U.S. not a party)

III. Citizenship of Principal Parties
(Diversity Cases Only)

Plaintiff:- N/A
Defendant:- N/A

IV. Origin : 1. Original Proceeding

V. Nature of Suit: 440 Other Civil Rights

VI. Cause of Action: 42 U.S.C. Section 1983

VII. Requested in Complaint

Class Action:
Dollar Demand:
Jury Demand: Yes

VIII. This case IS NOT a refiling of a previously dismissed case.

U.S. DISTRICT COURT
CLERK
04 JUL 15 AM 9:57
FILED FOR DOCKETING
ED-7

DOCKETED
JUL 16 2004

Signature: _____

Date: _____

7/15/04

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the Back button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. Note: You may need to adjust the font size in your browser display to make the form print properly. Revised: 06/28/00

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

JUDGE RONALD GUZMAN
MAGISTRATE JUDGE KEYS

In the Matter of

EASTERN DIVISION

William Ryan v. Roger E. Walker, Kenneth R. Briley,
Robert Catchings, Sergio Molina, and Barbara Hurt

Case Number:

04C 4635

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:
PLAINTIFF - WILLIAM RYAN

FILED FOR PROCKETTING
ED-7
JUL 15 AM 9:58
CLERK COURT
U.S. DISTRICT COURT

SIGNATURE ^{(A)(E)} 		SIGNATURE ^{(F)(B)} 	
NAME SAMUEL FIFER		NAME TERRANCE NORTON	
FIRM Sonnenschein Nath & Rosenthal LLP		FIRM Sonnenschein Nath & Rosenthal LLP	
STREET ADDRESS 233 S. Wacker Dr. Suite 8000		STREET ADDRESS 233 S. Wacker Dr. Suite 8000	
CITY/STATE/ZIP Chicago/Illinois/60606		CITY/STATE/ZIP Chicago/Illinois/60606	
TELEPHONE NUMBER 312-876-3114	FAX NUMBER 312-876-7934	TELEPHONE NUMBER 312-876-7939	FAX NUMBER 312-876-7934
E-MAIL ADDRESS sfifer@sonennschein.com		E-MAIL ADDRESS tnorton@sonennschein.com	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 00803006		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 2066092	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
SIGNATURE ^{(C)(G)} 		SIGNATURE ^(D) 	
NAME CARIN S. RIEKES		NAME TERRANCE NORTON	
FIRM Sonnenschein Nath & Rosenthal LLP		FIRM DOCKETED	
STREET ADDRESS 233 S. Wacker Dr. Suite 8000		STREET ADDRESS JUL 16 2004	
CITY/STATE/ZIP Chicago/Illinois/60606		CITY/STATE/ZIP	
TELEPHONE NUMBER 312-876-6159	FAX NUMBER 312-876-7934	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS criekes@sonnenschein.com		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6280998		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

1-3

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JUDGE RONALD GUZMAN

EASTERN DIVISION

MAGISTRATE JUDGE KEYS

In the Matter of

Bill Ryan

v.

Roger Walker, et al.

Case Number: **04C**

U.S. DISTRICT COURT

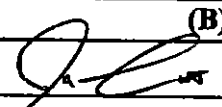
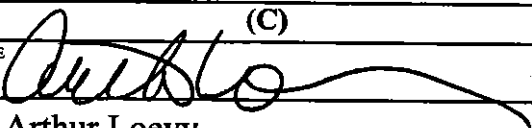
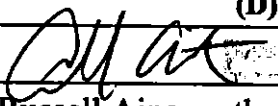
JUL 15 AM 9:37

FOR DOCKETING

EO-7

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR

Plaintiff

(A)		(B)	
SIGNATURE		SIGNATURE 	
NAME		NAME Jon Loevy	
FIRM		FIRM Loevy & Loevy	
STREET ADDRESS		STREET ADDRESS 312 N. May St., Suite 100	
CITY/STATE/ZIP		CITY/STATE/ZIP Chicago, IL 60607	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER (312) 243-5900	FAX NUMBER (312) 243-5902
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 02618254	
MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL?		YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE 		SIGNATURE 	
NAME Arthur Loevy		NAME Russell Ainsworth	
FIRM Loevy & Loevy		FIRM Loevy & Loevy	
STREET ADDRESS Same		STREET ADDRESS Same	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 1682479		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6280777	
MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL?		YES <input type="checkbox"/> NO <input type="checkbox"/>	

**DOCKETED
JUL 16 2004**

1-3

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

MAGISTRATE JUDGE KEYS

In the Matter of

EASTERN DIVISION

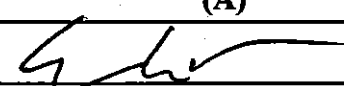
Bill Ryan v. Roger Walker, et al

04C 4635
Case Number:

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR

Bill Ryan

FILED FOR DOCKETING
09 JUL 15 AM 9:58
U.S. DISTRICT COURT
CLERK COURT
FD-7

(A)		(B)	
SIGNATURE 		SIGNATURE	
NAME Alan Mills		NAME	
FIRM Uptown People's Law Center		FIRM DOCKETED	
STREET ADDRESS 4404 North Broadway		STREET ADDRESS JUL 16 2004	
CITY/STATE/ZIP Chicago, IL 60640		CITY/STATE/ZIP	
TELEPHONE NUMBER 773-769-1411	FAX NUMBER 773-769-2224	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS alanmill@aol.com		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6181054		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

1-3