

121472

No. 121472

11/01/2016

Supreme Court Clerk

IN THE SUPREME COURT OF ILLINOIS

MARYAM AHMAD,)
Petitioner,)
v.)
On Emergency Motion for)
Reconsideration of this Court's Denial)
of Petitioner's Emergency Motion for)
Supervisory Order or for Leave to File)
Writ of Prohibition or Mandamus)
ILLINOIS STATE BOARD OF)
ELECTIONS, and CHICAGO BOARD OF)
ELECTION COMMISSIONERS, and its)
Members, MARISEL A. HERNANDEZ,)
Chairwoman, WILLIAM J. KRESSE, &)
JONATHAN T. SWAIN, and DAVID ORR,)
in his official capacity as COOK COUNTY)
CLERK, and RHONDA CRAWFORD,)
Respondents.)

PETITIONER'S EMERGENCY MOTION FOR RECONSIDERATION OF THIS COURT'S DENIAL OF PETITIONER'S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS

NOW COMES, Petitioner, MARYAM AHMAD, by and through her attorneys, Odelson & Sterk, Ltd, and asks this Court to respectfully reconsider its denial of the Petitioner's Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or Mandamus. In support thereof, Petitioner states as follows:

- 1. On October 21, 2016, Petitioner filed its "Emergency Motion For Supervisory Order Or For Leave To File Writ Of Prohibition Or Mandamus."
2. On October 28, 2016, the Illinois State Board of Elections ("SBOE") filed its Response to the Petitioner's Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or Mandamus. According to the SBOE, this case was not "ripe" because Crawford

met the requirements to be a judge where she was “licensed to practice law” in Illinois. (*SBOE Response*, ¶¶6-8, *citing* Ill. Const. Art VI, §11).

3. On October 31, 2016, after the filings by the Plaintiff and the SBOE, Crawford’s license to practice law was suspended by this Court. Thus, Crawford is no longer qualified to be a judge in the State of Illinois.

4. On October 31, 2016, this Court also denied Petitioner’s Emergency Motion.

5. If this Court does not move to remove Crawford from the November 8, 2016 ballot or suppress the ballots if she is elected, Crawford will not be able to serve the People as a judge because she is not qualified. This will create a judicial vacancy in Cook County, Illinois.

6. There is a legally qualified candidate running as a write-in candidate in the same race as Crawford, the Hopkins vacancy of the First Judicial Subcircuit.

7. Voters of the First Judicial Subcircuit should be allowed to cast their votes in a meaningful way and elect a judge to represent the subcircuit.

WHEREFORE, Petitioner respectfully requests this Court reconsider its denial of the Petitioner’s Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or *Mandamus*, or suppress and not count votes cast for her.

Dated this 1st day of November, 2016.

Respectfully submitted,

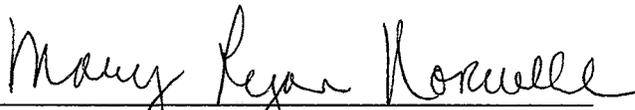
MARYAM AHMAD, Petitioner

By: /s/Mary Ryan Norwell
Mary Ryan Norwell, one of her Attorneys

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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he has read PETITIONER'S EMERGENCY MOTION FOR RECONSIDERATION OF THIS COURT'S DENIAL OF PETITIONER'S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR *MANDAMUS* and the statements set forth therein are true and correct, except as to matter therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Mary Ryan Norwell

Subscribed and Sworn to before me
this 1st day of November, 2016.



NOTARY PUBLIC



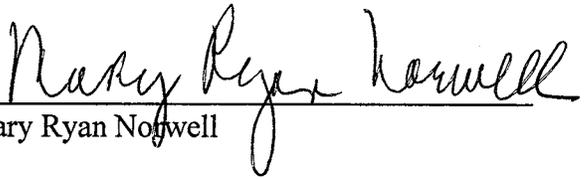
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now and the General Election.

5. If the matter is not resolved prior to the election, some voters may be disenfranchised by voting for an ineligible candidate.

6. I have read the Petitioner's Emergency Motion for Reconsideration of this Court's Denial of Petitioner's Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or *Mandamus*, and incorporate same herein as if set forth in this Affidavit verbatim.

FURTHER AFFIANT SAYETH NAUGHT.


Mary Ryan Norwell

Subscribed and Sworn to before me
this 1st day of November, 2016.


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**IN THE
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in his official capacity as COOK COUNTY)	
CLERK, and RHONDA CRAWFORD,)	
)	
Respondents.)	

NOTICE OF FILING AND SERVICE

TO: See attached Service List

PLEASE TAKE NOTICE that on **November 1, 2016**, the undersigned electronically filed with the Clerk of the Illinois Supreme Court, **PETITIONER’S EMERGENCY MOTION FOR RECONSIDERATION OF THIS COURT’S DENIAL OF PETITIONER’S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS**, a copy of which is hereby served upon you.

By: /s/Mary Ryan Norwell
One of Petitioner’s Attorneys

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CERTIFICATE OF SERVICE

I, Mary Ryan Norwell, an attorney, certify that on November 1, 2016, I caused a true and correct copy of **PETITIONER'S EMERGENCY MOTION FOR RECONSIDERATION OF THIS COURT'S DENIAL OF PETITIONER'S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS** to be served upon the parties, *via e-mail*, at the e-mail addresses indicated in the below Service List.

/s/Mary Ryan Norwell

Mary Ryan Norwell

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