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No. 121472

OCT 27 2016

IN THE
SUPREME COURT OF ILLINOIS

CLERK
SUPREME COURT
CHICAGO

MARYAM AHMAD,

Petitioner,

v.

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.

**RHONDA CRAWFORD'S MOTION FOR EXTENSION OF TIME
IN WHICH TO RESPOND TO EMERGENCY MOTION FOR SUPERVISORY ORDER
OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS**

COMES Rhonda Crawford, by her attorneys, and for her Motion for an Extension of Time in Which to Respond to Maryam Ahmad's Emergency Motion for Supervisory Order or For Leave to File Writ of Prohibition or *Mandamus*, states as follows:

1. Rhonda Crawford is a candidate for the office of Circuit Court Judge for the 1st Judicial Sub-Circuit.

2. Ms. Crawford was the prevailing candidate in the Democratic Primary in March 2016. Initially, Ms. Crawford was unopposed in the general election. However, at this point, Maryam Ahmad is now a write in candidate for the same office. Ms. Ahmad's status as a write in candidate is currently the subject of an appeal.

FILED

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CHICAGO
SUPREME COURT CLERK

3. Ms. Ahmad has filed an Emergency Motion for Supervisory Order or For Leave to File Writ of Prohibition or *Mandamus* in which she seeks to have Ms. Crawford removed from the ballot in the general election or to “suppress” votes cast in Ms. Crawford’s favor in the general election. See Motion at 6-8. Given that early voting has already begun and that Ms. Crawford is lawfully on the ballot for the election, the relief that Ms. Ahmad seeks, to remove Ms. Crawford from the ballot, is inappropriate and moot. As to the request to suppress the votes cast by the electorate that would be an interference with 1st Amendment rights of voters.

Nevertheless, Rhonda Crawford seeks an extension of time in which to respond to the Emergency Motion. The Motion was filed with this Court on October 21, 2016 and therefore, a response would be due on October 28, 2016.

4. Ms. Crawford seeks an extension of time until November 7, 2016. The basis for the motion is that Ms. Crawford’s primary counsel, George Collins, passed away on October 14, 2016. Ms. Ahmad’s Motion is predicated on the existence of disciplinary proceedings instituted by the Attorney Registration and Disciplinary Commission against Ms. Crawford. Mr. Collins was a well recognized attorney in such matters. As such, Ms. Crawford has employed attorney Mary Robinson, former Administrator of the Attorney Registration and Disciplinary Commission, to represent her in matters relating to her law license, as referenced in Ms. Ahmad’s Emergency Motion.

5. This Motion is not brought for the purpose for delay, but to allow a complete response to the motion filed by Ms. Ahmad which seeks extraordinary relief. Suppressing the votes cast by citizens of this State is an extreme “remedy”. All of the relief which Ms. Ahmad seeks can be obtained through the procedures set forth in the Election Code, but because of the allegations

of the Motion, an extension of time is necessary to address the arguments of Ms. Ahmad, especially as they relate to the pending disciplinary proceedings.

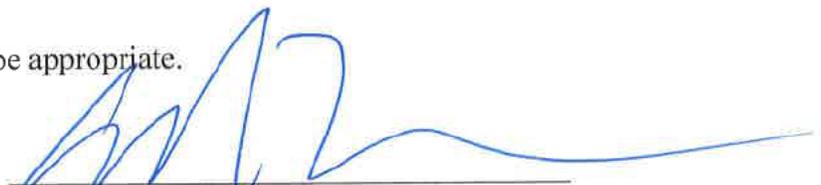
6. Ms. Crawford recognizes that the integrity of the judicial system must be maintained. As such, Ms. Crawford agrees, should she be fortunate enough to prevail in the general election, to defer or delay her assuming the office of judge until proceedings before the Attorney Registration and Disciplinary Commission are concluded. In this way, the concerns raised by Ms. Ahmad would be addressed while Ms. Crawford has a reasonable period of time to respond to the Motion and the election would not be disrupted.

WHEREFORE, Rhonda Crawford respectfully requests this Court enter an order and granting her motion as follows:

1. Granting Rhonda Crawford until November 7, 2016 or for such other reasonable time to allow Crawford to respond to the Emergency Motion for Supervisory Order or For Leave to File Writ of Prohibition or *Mandamus*;

2. For such other relief as may be appropriate.

By:


One of the Attorneys for Rhonda Crawford

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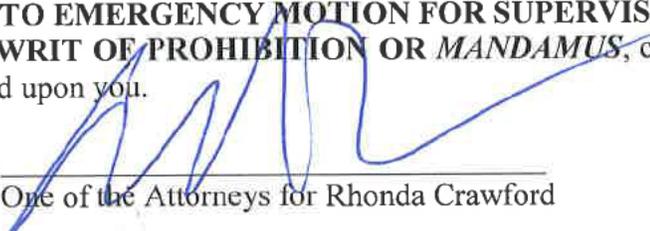
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SWAIN, and DAVID ORR, in his official
capacity as COOK COUNTY CLERK, and
RHONDA CRAWFORD,

Respondents.

NOTICE OF FILING

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on the 27th day of October, 2016, we caused to be filed with the Clerk of the above Court, **RHONDA CRAWFORD'S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS**, copies of which are attached and herewith served upon you.

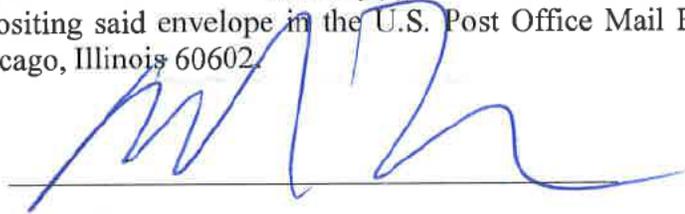
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One of the Attorneys for Rhonda Crawford

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CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, and subject to penalties thereof the undersigned certifies that at or before the hour of 5:00 p.m. on this 27th day of October, 2016 he caused to be served the foregoing document with any attachments upon the attorney(s) of record of all parties to the above cause via electronic mail and by enclosing the same in an envelope addressed to such attorney(s) at their business address with postage fully prepaid, and by depositing said envelope in the U.S. Post Office Mail Box located at One North LaSalle Street, Chicago, Illinois 60602.

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be the initials 'MJD' followed by a long, sweeping horizontal stroke.

SERVICE LIST

Via: Electronic Mail, Facsimile and Regular Mail

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Respondents.

ORDER

This cause coming to be heard for Rhonda Crawford's Motion for an Extension of Time in Which to Respond to Maryam Ahmad's Emergency Motion for a Supervisory Order and other relief, notice having been given. It is hereby ordered:

1. The motion is granted. Ms. Crawford is granted until November 7, 2016 in which to respond;
2. The motion is denied.

ENTER:

Justice: _____

Justice: _____

Justice: _____