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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

**IN THE MATTER OF THE CONSERVATION OF  
NEXTLEVEL HEALTH PARTNERS, INC.**

Jacqueline Stevens, Intervenor, *Pro Se*

2020 CH 04431

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**MOTION FOR LEAVE TO FILE SUPPLEMENTAL MOTION**

Intervenor respectfully requests permission to file a motion to order the Department of Insurance to release financial information, declare the Termination Provision unconstitutional, reply to sur-reply, strike sentence from sur-reply, and provide sanctions for violations of Illinois Supreme Court Rule 137 (“Rule 137”).

The attached motion (Exhibit A) joins numerous related pleadings to present to the court information obtained recently that is materially relevant to issues central to this litigation about the exclusion of the public from court proceedings through which NextLevel was declared insolvent and began liquidation shortly after an order was issued granting the Department of Insurance complaint under the Insurance Code provision for conservation. Illinois Supreme Court Rule 135a) Single Equitable Cause of Action states,

Matters within the jurisdiction of a court of equity, whether directly or as an incident to other matters before it, or which an equity court can hear so as to do complete justice between the parties, may be regarded as a single equitable cause of action and when so treated as a single cause of action shall be pleaded without being set forth in separate counts and without the use of the term ‘count.’”

This matter was initially pled pursuant to this rule. Although Rule 135a is for initial pleadings,

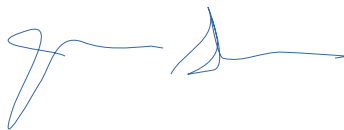
it would seem to support a motion that includes related matters and that, in the interests of judicial efficiency, merit being pled together.

The legal arguments in the attached motion relate to a common nexus of facts and pleadings. In particular, NextLevel's Opposition Response and Sur-Reply make false statements in violation of Rule 137; the fact of the Rule 137 violations – that attorneys are misrepresenting filings central to a case about the need for public oversight – is relevant to the underlying controversy in this case, as are the sanctions requested, especially an obligation for DLA Piper to pay attorney fees for Intervenor's filings in this case going forward.

Respectfully Submitted,  
/s/ Jacqueline Stevens  
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June 8, 2022

#### VERIFICATION

I, the undersigned, swear under penalty of perjury, as provided by law under Section I-109 of the Illinois Rule of Civil Procedure, that the statements contained in this motion are true and correct to the best of my knowledge and belief, except where I lack sufficient knowledge to form a belief of the truth of the allegations, where so stated.



Jacqueline Stevens

CERTIFICATE OF SERVICE

I certify that on June 8, 2022, I caused the foregoing document to be filed and served on all counsel of record.

/s/ Jacqueline Stevens