

**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 RULING ON RELIEF SOUGHT PURSUANT TO THE MOTION TO  
DECLARE PUBLIC RECORDS IN THE PUBLIC RECORD**

Intervenor Jacqueline Stevens (“Intervenor”) respectfully requests the Court rule on the Motion for Order Declaring All Records Released by Chancery Division for 2020 CH 04431 are Public Records (“Public Records Motion”). Following presentment on April 12, 2022 the Court stated the Court would rule on this motion in the final order. The Court’s final judgment was issued June 13, 2022 and does not respond to the relief requested in the aforementioned motion.

Proceeding History

On November 29, 2021, the Court issued an order lifting the stay on ending sequestration and granting NextLevel’s motion to file exhibits under seal and replace the original Complaint of June 3, 2020 and order of June 9, 2020 with versions that had portions redacted. On December 6, 2021, the court issued an order granting Jacqueline Stevens Intervenor status for the purpose of making arguments about the “public nature of these proceedings.” Intervenor filed her Amended Motion on January 31, 2022. On March 14, 2022, NextLevel filed its opposition response. On March 21, 2022 the People of Illinois representing the Department of Insurance filed its Opposition Response motion. Intervenor on April 4, 2022 filed a motion to obligate

parties to notice all motions to Intervenor and to declare public all records for 2020 CH 04431 previously released by Chancery Division. On April 26, 2022, NextLevel filed its Sur-Reply. On June 8, 2022, Intervenor filed a motion for leave to file Supplemental Motion and attached as an exhibit a motion containing new evidence, a Sur-Sur Reply, and a motion for sanctions. Later that day, oral argument was held on the briefings and the Court announced an intention to issue the final judgment at 2 p.m. on June 13, 2022. On June 12, 2022, Intervenor filed a Motion to Postpone the Final Order. Following presentment at a hearing on June 13, 2022, the Court issued an order denying motions in the exhibit containing the supplemental motions with the exception of the motion for sanctions under Illinois Supreme Court Rule 137. The Court also denied the Motion for Postponement. In a written order issued later on June 13, 2022, the Court issued its final judgment on Intervenor's Amended Motion and denied the motion to vacate the seal and redaction orders November 29, 2021. The final order omitted any reference to the Public Records Motion or its subject matter.

#### Ruling Requested

Intervenor on April 4, 2022 filed a motion requesting the Court declare public records the Court ordered sealed and redacted but remained in the public domain: "Based on the first amendment and to avoid Orwellian misnomers, intervenor requests the court declare that all documents released by the Chancery Division to the public are public records, pursuant to which those records ordered redacted or sealed will be declared public and all records in the proceeding to date will be open to the public." Public Records Motion, p. 6. The Court did not request further briefing and stated the Court would respond to the motion in the Court's final order.

However, the final order of June 13, 2022 makes no reference to the motion or subsequent filings referencing the Public Records Motion and exhibits documenting that documents ordered redacted on November 29, 2021 remained unredacted in the public record through May 26, 2022 and apparently as late as June 16, 2022. (“...NextLevel’s counsel on June 16, 2022 again communicated with the Clerk and confirmed that the unredacted versions of the Complaint and Conservation Order *will* be placed under seal and only the redacted versions *will* be available on the public Docket.” NextLevel Health Partner Inc.’s Opposition to Intervenor’s Supplemental Motion, p. 3, note 3, emphasis added.

Insofar as the final judgment in this case omits any reference to the facts, law, precedents, equities and relief pleaded for above, Intervenor respectfully requests that the Court issue an order granting or denying Intervenor’s Motion for an Order Declaring All Records Released by Chancery Division for 2020 CH 04431 are Public Records.

Respectfully Submitted,  
/s/ Jacqueline Stevens  
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June 21, 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 21, 2022, I caused the foregoing document to be filed and served on all counsel of record.