

No. 1-23-0803

APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT

In the Matter of Conservation of NextLevel
Health Partners, Inc.

Appeal from the Circuit Court of Cook
County, Illinois

JACQUELINE STEVENS,
Intervenor-Appellant, *pro se*

Notice of Appeal: May 4, 2023

v.

PEOPLE OF THE STATE OF ILLINOIS
ex rel. DANA POPISH SEVERINGHAUS,
Director of the Illinois Department of
Insurance, and Dana Popish Severinghaus,
Director of the Illinois Department of
Insurance, acting solely in her capacity as
Conservator of NextLevel Health Partners,
Inc.,

Case No. 2020 CH 04431

Plaintiffs-Appellees,

and

Hon. Pamela McLean Meyerson, Judge
Presiding

NEXTLEVEL HEALTH PARTNERS,
INC.

Defendant-Appellee

**INTERVENOR-APPELLANT MOTION FOR EXTENSION
OF TIME TO FILE REPLY BRIEF**

Intervenor-Appellant, Dr. Jacqueline Stevens, Professor at Northwestern University and Director of the Deportation Research Clinic respectfully moves this court for a 60-day extension of time to file a reply brief, from July 10, 2024, to and including September 9, 2024. The attached verification by certification supports this motion.

Respectfully submitted,

JACQUELINE STEVENS
pro se

By: /s/ Jacqueline Stevens

601 University Place
Political Science Department, Second Floor
Northwestern University
Evanston, IL 60208

Phone number: (847) 467-2098

Phone number (Secondary): (847) 491-7450

Email: jackiestevens@protonmail.com

VERIFICATION BY CERTIFICATION

I, Jacqueline Stevens, state the following:

1. I am a citizen of the United States over the age of 18. My current business address is 601 University Place, Political Science Department, Second Floor, Northwestern University, Evanston, Illinois, 60208. I have personal knowledge of the facts set forth in this verification by certification. If called upon, I could competently testify these facts.

2. I am a Professor of Political Science and the founding director of the Deportation Research Clinic at Northwestern University. My research and teaching objectives are to enhance legal literacy and advance the rule of law. My transparency litigation and scholarship have catalyzed significant class action lawsuits, including one in which a federal jury found the GEO Corporation owed \$17.3 million in back-pay to those who performed work while in GEO's custody in their Tacoma, Washington facility; a federal judge ordered the firm to disgorge to the State of Washington an additional \$5.9 million from unjust enrichment.¹

3. I am a *pro se* litigant.

4. Currently, a reply brief is due on July 10, 2024.

5. I have done my best to comply with the preferences expressed in in 1st Dist. Local R. 4(c), so that this court may resolve the motion and any objection to the motion before the due date. July 5, 2024 was a deadline for a McLatchy syndicate venue submission of an opinion piece tied to Independence Day celebrations. This is my first request for an extension.

6. I will be unable to submit a reply brief and file it with the court by its due date

¹ Jacqueline Stevens, "One Dollar per Day: The Slaving Wages of Immigration Jail, from 1943 to present." *Georgetown Immigration Law Journal*, 29 (2014): 391-500; Attorney General, State of Washington, "For-profit operator of the Northwest ICE Processing Center must pay \$23.2 million as a result of unfair labor practices." Press Release, November 2, 2021. <https://www.atg.wa.gov/news/news-releases/profit-operator-northwest-ice-processing-center-must-pay-232-million-result>.

because I am: (a) seeking counsel; (b) awaiting review of a Rule Change Petition; and (c) handling other obligations.

7. *Seeking assistance of counsel.* Following receipt of Response Briefs on June 26, 2024 I had a meeting with attorneys at a nonprofit civil rights firm that is now reviewing filings for the purpose of evaluating their ability to represent me in this proceeding. I was advised that under this circumstance it would be appropriate for me to request a 60-day extension for the Reply Brief.

8. *Awaiting a review of a Rule Change Petition.* On May 8, 2024, I submitted a Rule Change Petition to the Illinois Supreme Court Rules Committee to amend Rule 8, proposing public and free access on request to court records, dockets and books required by law to be kept by court clerks unless ordered sealed, sequestered, or redacted. May 8, 2024 Petition for Rule Change, "Exhibit 1."

9. On May 14, 2024, this petition was docketed with the Illinois Supreme Court Clerk as Proposal 24-08, PR000326 and forwarded to the Illinois Supreme Court's e-Business Policy Board, in accordance with Rule 3(d)(1).

10. Out of respect for this court's deadlines, I requested expedited review from the e-Business Policy Review Board. On June 25, 2024, I was notified that the Review Board cannot accommodate an expedited review. If I cannot obtain representation, then prior to filing a reply brief and other motions relevant to this complex litigation I will need to pursue alternative means for obtaining access to appellate court filings.

11. I am also the Founding Director of the Deportation Research Clinic at Northwestern, part of the Buffett Institute for Global Affairs. I am responsible for attending to filings and review of productions for litigation pursued under the Freedom of Information Act ("FOIA").

12. I am engaged in active litigation to enforce my right to records responsive to over a dozen FOIA requests. For purposes of a response brief in litigation against Immigration and Customs Enforcement, I am required to submit an analysis responding to an affidavit and Vaughn Index we received from Immigration and Customs Enforcement covering over 10,000 pages of production. On Monday, July 1, 2024 the attorney representing me in the FOIA litigation indicated she was checking on the deadline. I have not heard further information but the docket indicates our reply was due on June 21, 2024. I have been preparing to assist in an immediate response. The case is 1:20-cv-02725. Our cross-reply brief is due August 5, 2024.

13. During the summer, it is my responsibility to provide supervision and mentorship to four students who have research funding, two as Political Science Department Farrell Fellows and two pursuing research through the Institute for Policy Research. This requires time-consuming, hands-on training and supervision, including for an ongoing project on citizenship initiatives spanning three continents and for which I am a co-principal investigator, along with a colleague at Durham University, United Kingdom. I am presently responsible for supervising the creation of a project platform being undertaken by a programmer in Nigeria.

14. I also have a deadline of July 8, 2024 for revisions to a chapter in a collection under preparation for publication by Duke University Press.

15. My request for an extension is made for the purpose of insuring an accurate and complete Reply Brief on issues of first impression while fulfilling my duties as a professor and director of the Deportation Research Clinic, for which I have no staff or administrative support.

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

Executed July 6, 2024.

/s/Jacqueline Stevens

JACQUELINE STEVENS

Professor, Political Science Department

Founding Director Deportation Research Clinic

601 University Place, Political Science, Second Floor

Northwestern University

Evanston, IL 60208

Phone Number: (847) 467-2093

Phone Number: (847) 491-7450

Email: jackiestevens@protonmail.com

No. 1-23-0803

IN THE
APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT

IN THE MATTER OF)	Appeal from the Circuit Court of
CONSERVATION OF NEXTLEVEL	Cook)
HEALTH PARTNERS,)	County, Illinois, County Department,
_____)	Chancery Division
)	
DR. JACQUELINE STEVENS,)	
)	
Intervenor-Appellant)	
)	
v.)	
)	
PEOPLE OF THE STATE OF)	
ILLINOIS ex rel. DANA POPISH)	
SEVERINGHAUS, Director of the)	No. 2020 CH 4431
Illinois Department of Insurance, and)	
DANA POPISH SEVERINGHAUS,)	
Director of the Illinois Department of)	
Insurance, acting solely in her capacity)	
as Conservator of NextLevel Health)	
Partners, Inc.,)	
)	
Plaintiffs-Appellees,)	
and)	
)	
NEXTLEVEL HEALTH PARTNERS,)	The Honorable
)	Pamela McLEAN MEYERSON
Defendant-Appellee.)	Judge Presiding

ORDER

This matter coming to be heard on the motion of Jacqueline Stevens, Professor and Founding Director of the Deportation Research Clinic at Northwestern University, for a 60 day extension of time to file appellant reply brief, from July 10, 2024, to and including September 9, 2024, due notice having been given, and the court being advised in the premises;

IT IS HEREBY ORDERED that the motion is GRANTED / DENIED.

ENTERED:

DATE

Jacqueline Stevens, *pro se*
Appellant
Professor, Northwestern University

CERTIFICATE OF FILING AND SERVICE

I certify that on July 6, 2024, I electronically filed the foregoing Intervenor-Appellant Motion for Extension of Time to File a Reply Brief with the Clerk of the Court for the Illinois Appellate Court, First District, by using the Odyssey eFileIL system.

I further certify that the other participants in this action, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served via the Odyssey eFileIL system.

Stephen Schwab
Stephen.Schwab@dlapiper.com

Daniel Guberman
dguberman@osdchi.com

Christopher M.R. Turner
CivilAppeals@ilag.gov

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

/s/Jacqueline Stevens
JACQUELINE STEVENS
Professor, Political Science Department
Founding Director Deportation Research Clinic
601 University Place, Political Science, Second Floor
Northwestern University
Evanston, IL 60208

Phone Number: (847) 467-2093
Phone Number: (847) 491-7450
Email: jackiestevens@protonmail.com