

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 THIRD 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 November 8, 2024 to and including January 7,  
2025. 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

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## 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.<sup>1</sup>

3. I am a *pro se* litigant.

4. Currently, a reply brief is due on November 8, 2024. This is my third request for an extension.

5. I will be unable to submit a reply brief and file it with the court by its due date because I am: (a) seeking counsel; (b) in the alternative preparing to file an appeal of an order denying my Rule Change Petition; and (c) handling other obligations.

6. *Seeking assistance of counsel.* Following receipt of Response Briefs on June 26,

2024 I have been pursuing legal representation. At present a very experienced attorney and  
<sup>1</sup> 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>.

official in an organization committed to promoting government accountability has agreed to serve as co-counsel of record if we can obtain organizational support and another co-counsel.

7. Since I filed my request for a second extension, a second very experienced attorney with ties to firms and nonprofits less concerned about retaliation from Democratic party officials than those with whom I have previously spoken has reviewed the filings in this case and is attempting to locate an organization to provide logistical support and serve as co-counsel.

8. 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 via a federal complaint.<sup>2</sup> If that is necessary, I will file a motion for a stay in proceedings.<sup>3</sup>

9. I have been continuing my responsibilities as a full-time professor in the Political Science Department at Northwestern University, teaching in the fall quarter Introduction to Political Theory and Deportation Law and Politics as well as continuing my responsibilities as the director of the Deportation Research Clinic. I also was elected recently to the position of President of the Northwestern University chapter of the American Association of University Professors, a position that also requires extensive time commitments.

10. My request for an extension as a *pro se* litigant is made for the purpose of insuring an accurate and complete Reply Brief on issues of first impression while fulfilling my duties as a

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<sup>2</sup> “Different Rules of Procedure govern the power of district courts and courts of appeals to stay an order pending appeal. See Fed. Rule Civ. Proc. 62(c); Fed. Rule App. Proc. 8(a). Under both Rules, however, the factors regulating the issuance of a stay are generally the same: (1) whether the stay applicant has made a strong showing that he is likely to succeed on the merits; (2) whether the applicant will be irreparably injured absent a stay; (3) whether issuance of the stay will substantially injure the other parties interested in the proceeding; and (4) where the public interest lies. See, e. g., *Virginia Petroleum Jobbers Assn. v. FPC*, 104 U.S.App.D.C. 106, 110, 259 F.2d 921, 925 (1958); *Washington Metropolitan Area Comm’n v. Holiday Tours, Inc.*, 182 U.S.App.D.C. 220, 221-222, 559 F.2d 841, 842-844 (1977); *Garcia-Mir v. Meese*, 781 F.2d 1450, 1453 (CA11 1986); *Accident Fund v. Baerwaldt*, 579 F. Supp. 724, 725 (WD Mich. 1984); see generally 11 C. Wright A. Miller, *Federal Practice and Procedure* § 2904 (1973).” *Hilton v. Braunskill*, 481 U.S. 770, 776-77 (1987).

<sup>3</sup> The details indicating my standing to file such a complaint and a draft thereof were submitted with my motion requesting a second extension of time. See *Intervenor-Appellant Motion for Extension of Time to File Reply Brief*, August 26, 2024, ¶¶7-8 and Exhibits 1 and 2.

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 October 30, 2024.

/s/Jacqueline Stevens

JACQUELINE STEVENS

Professor, Political Science Department

Founding Director Deportation Research Clinic

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Northwestern University

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Director of the Illinois Department of  
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Director of the Illinois Department of  
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Conservator of NextLevel Health Partners,  
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Case No. 2020 CH 04431

Plaintiffs-Appellees,

and

Hon. Pamela McLean Meyerson, Judge  
Presiding

NEXTLEVEL HEALTH PARTNERS,  
INC.

Defendant-Appellee

**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 November 8, 2024, to and including January 7, 2025, due notice having been given, and the court being advised in the premises;

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

ENTERED:

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DATE

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

**CERTIFICATE OF FILING AND SERVICE**

I certify that on October 30, 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](mailto:Stephen.Schwab@dlapiper.com)

Daniel Guberman  
[dguberman@osdchi.com](mailto:dguberman@osdchi.com)

Christopher M.R. Turner  
[CivilAppeals@ilag.gov](mailto: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

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