

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

---

STEPHANIE SCHOLL *and* FRANK BEDNARZ,

Plaintiffs,

v.

ILLINOIS STATE POLICE; BRENDAN F. KELLY,  
*in his official capacity as Director of the  
Illinois State Police*; JAY ROBERT PRITZKER,  
*In his official capacity as Governor of the  
State of Illinois*; KWAME RAOUL, *in his  
official capacity as Attorney General of  
Illinois*,

Defendants.

---

Case No. 1:24-cv-4435

Hon. Judge Martha M. Pacold

**Plaintiffs' Motion for Preliminary  
Injunction**

**MOTION**

Plaintiffs, Stephanie Scholl and Frank Bednarz, hereby move this Court to enjoin Defendants, Illinois State Police and the public officials responsible for their policies and practices, providing that for the duration of this litigation they may only access data collected by the challenged system of Automated License Plate Readers after first obtaining a warrant supported by probable cause. Such an injunction will protect Plaintiffs' rights while balancing any claimed law enforcement interest Defendants may submit.

Dated: August 20, 2024

Respectfully submitted,

Stephanie Scholl and Frank Bednarz

By: Reilly Stephens  
One of their Attorneys

Reilly Stephens  
Jeffrey Schwab

Liberty Justice Center  
7500 Rialto Blvd.  
Suite 1-250  
Austin, Texas 78735  
(512) 481-4400  
rstephens@ljc.org  
jschwab@ljc.org