

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

CLAIRE BALL;	)	
	)	
SCOTT SCHLUTER,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
LISA M. MADIGAN, Attorney General	)	
of Illinois;	)	
CHARLES W. SCHOLZ, Chairman,	)	
Illinois Board of Elections;	)	
ERNEST L. GOWEN, Vice Chairman,	)	
Illinois Board of Elections;	)	Civil Case No. 15-cv-10441
BETTY J. COFFRIN, Member, Illinois	)	
Board of Elections;	)	Hon. John Z. Lee
CASANDRA B. WATSON, Member,	)	
Illinois Board of Elections;	)	
WILLIAM J. CADIGAN, Member,	)	
Illinois Board of Elections;	)	
ANDREW K. CARRUTHERS, Member,	)	
Illinois Board of Elections;	)	
WILLIAM M. MCGUFFAGE, Member,	)	
Illinois Board of Elections;	)	
JOHN R. KEITH, Member, Illinois	)	
Board of Elections, all in their official	)	
capacities,	)	
	)	
Defendants.	)	

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**PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

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Plaintiffs respectfully move for summary judgment on grounds “that there is no genuine issue as to any material fact and that [they are] entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a). Contemporaneously, Plaintiffs file their memorandum in support of this motion,

together with their Statement of Material Facts. Plaintiffs also rely on all evidence of record previously submitted in this case, including, but not limited to, their verified complaint (Dkt. 24) and Defendants' Responses to Plaintiffs' First Set of Interrogatories.

For the reasons set forth in Plaintiffs' memorandum in support, Plaintiffs respectfully request that the Court (1) grant Plaintiffs' motion for summary judgment on their First Amendment claim; (2) declare the campaign contribution ban in 10 ILCS 5/9-45 to be unconstitutional on its face; (3) permanently enjoin the Defendants from enforcing 10 ILCS 5/9-45; (4) award Plaintiffs nominal damages in the amount of \$1.00; and (5) grant Plaintiffs any other relief the Court deems just and appropriate.

Plaintiffs respectfully request oral argument on this motion.

Dated: June 1, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Benjamin Barr, certify that the foregoing Motion for Summary Judgment was served upon Defendants on June 1, 2016, using the Court's CM/ECF system.

/s/ Benjamin Barr  
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