

Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

FILED
1/25/2019 1:39 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2018CH14198

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

MICHAEL BEYER, DAVID RAMOS,
THEA KACHORIS-FLORES,)
DEBORA LAND, RUPA)
RAMADURAI, CHRISTOPHER)
MCCABE, JEZAIL JACKSON,)
SIMEON HENDERSON)

Plaintiffs,)

v.)

BOARD OF EDUCATION OF THE)
CITY OF CHICAGO, JANICE)
JACKSON, in her capacity of CEO of)
Chicago Public Schools, MARY)
ERNESTI, in her capacity as Director of)
Employment Engagement for Chicago)
Public Schools,)

Defendants.

) Case No.: 2018-CH-14198

) Honorable Anna A. Loftus

PLAINTIFF RUPA RAMADURAI'S MOTION FOR VOLUNTARY DISMISSAL

Plaintiff Rupa Ramadurai, through her attorneys, The Quinlan Law Firm, LLC, pursuant to 735 ILCS 5/2-1009, states as follows:

1. Ms. Ramadurai believes that, due to her position as an employee at Illinois State Board of Education, her continued participation in case number 2018-CH-14198 presents the appearance of a conflict of interest. Ms. Ramadurai, therefore, wishes to voluntarily dismiss her action against the Defendants.
2. The dismissal of Ms. Ramadurai's action will not affect the claims of the remaining plaintiffs, Dr. Michael Beyer, David Ramos, Thea Kachoris-Flores, Debora Land, Christopher McCabe, Jezail Jackson, and Simeon Henderson against the Defendants.
3. No trial or hearing has yet begun in this action.
4. Notice of this Motion has been provided to the Defendants.

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5. Ms. Ramadurai is unaware of any costs that have been incurred by defendants as a result of her action.

WHEREFORE, Plaintiff Rupa Ramadurai respectfully request that the Court enter an order:

- a. Dismissing Ms. Ramadurai's claims against Defendants in case number 2018-CH-14198, without prejudice; and
- b. Removing Ms. Ramadurai's name from the caption in all future filings in case number 2018-CH-14198.

Date: January 25, 2019

Respectfully submitted,

/s/ William J. Quinlan
One of their Attorneys

William J. Quinlan
Eric T. Schmitt
The Quinlan Law Firm, LLC
233 South Wacker Drive, Suite 6142
Chicago, Illinois 60606
Telephone: (312) 883-5500
Facsimile: (312) 971-1070
Firm ID No. 43429

CERTIFICATE OF SERVICE

On January 25, 2019, at approximately 1:40 p.m., I certify under oath that I served a true and correct copy of the above document, **PLAINTIFF RUPA RAMADURAI'S MOTION FOR VOLUNTARY DISMISSAL** on the following individuals via eFileIL and via electronic mail at the email addresses listed below.

James Ciesil (jciesil@cps.edu)
Libby Massey (lnmassey1@cps.edu)
Deputy General Counsel
Chicago Board of Education
1 N. Dearborn St., Ste. 900
Chicago, IL 60602
Attorneys for Defendants

Mary Ernesti
mernesti@cps.edu
Defendant

/s/ Nicole Griesbach
Non-Attorney

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MICHAEL BEYER, DAVID RAMOS,)
THEA KACHORIS-FLORES, DEBORA)
LAND, RUPA RAMADURAI,)
CHRISTOPHER MCCABE, JEZAIL)
JACKSON, SIMEON HENDERSON)

Plaintiffs,)

v.)

BOARD OF EDUCATION OF THE CITY)
OF CHICAGO, JANICE JACKSON, in her)
capacity of CEO of Chicago Public Schools,)
MARY ERNESTI, in her capacity as)
Director of Employment Engagement for)
Chicago Public Schools,)

Defendants.)

Case No.: 2018-CH-14198

Honorable Anna A. Loftus

NOTICE OF MOTION

TO: James Ciesil (jciesil@cps.edu)
Libby Massey (lnmassey1@cps.edu)
Deputy General Counsel
Chicago Board of Education
1 N. Dearborn St., Ste. 900
Chicago, IL 60602
Attorneys for Defendants

Mary Ernesti, Defendant
mernesti@cps.edu

PLEASE TAKE NOTICE that on Wednesday, December 30, 2018, at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Hon. Anna K. Loftus or any judge who may be sitting in her stead, in the Courtroom usually occupied by him in Room 2410, of the Circuit Court of Cook County, Chancery Division, Richard J. Daley Center, 50 W. Washington St., Chicago, Illinois, and shall then and there present the **PLAINTIFF RUPA RAMADURAI'S MOTION FOR VOLUNTARY DISMISSAL**, a copy of which was filed today, and subsequently served upon you, at which time and place you may appear if you so desire.

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Date: January 25, 2019

Respectfully submitted,

/s/ William J. Quinlan
One of their Attorneys

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Attorneys for Defendants

Mary Ernesti
mernesti@cps.edu
Defendant

/s/ Nicole Griesbach
Non-Attorney

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



Michael Berger et al
v.
Chicago Board of Education et al.

No. 2018 CH 14198

ORDER

This matter coming before this Honorable Court on 2/1/2019, on a status call, it is Hereby ordered:

① Defendant's ^{oral motion to} answer to Plaintiff's Amended Complaint is ~~stayed pending a further Order of this Court~~ continued to February 8, 2019, and

② Status is set for February 8, 2019, at 10:00 a.m. 427

Attorney No.: 91206
Name: James Ciesil
Atty. for: Defendants
Address: 1 N. Dearborn St.
City/State/Zip: Chicago IL 60601
Telephone: (773) 553-1643

Judge Anna M. Loftus
Dated: FEB -1 2019
Circuit Court 7102

Judge Judge's No.