

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

JULIE CONTRERAS, IRVIN FUENTES,)
ABRAHAM MARTINEZ, IRENE)
PADILLA, and ROSE TORRES,)

Plaintiff,)

v.)

Case No. 21 CV 3139

ILLINOIS STATE BOARD OF)
ELECTIONS, ET AL.,)

Defendants,)

and,)

ANGELICA GUERRERO-CUELLAR, in)
her official capacity as Illinois State)
Representative for the 22nd District)

Petitioner/Defendant-Intervenor.)

**PETITIONER-INTERVENOR’S MOTION TO WITHDRAW
MOTION TO INTERVENE WITHOUT PREJUDICE**

NOW COMES Petitioner-Defendant-Intervenor, Angelica Guerrero-Cuellar (the “Representative”) by and through her attorney Veronica Bonilla-Lopez of Del Galdo Law Group, LLC, and moves to withdraw her Motion to Intervene without prejudice and in support thereof states as follows:

1. The Representative filed her Motion to Intervene as a Defendant in this matter on August 19, 2021. Plaintiffs filed a response on August 27, 2021 and the Reply was filed on August 31, 2021. The motion has been taken under advisement.

2. Also on August 31, 2021 the General Assembly convened to vote on an amended district map that incorporated the data from the census.
3. This Court previously provided in its minute order entry dated August 23, 2021 that the dispositive motions remain under advisement, “though the panel observes that in the event that the General Assembly enacts an amended redistricting plan ... the parties may need to consider whether to amend the pleadings and motions that currently are on file.” Dkt. #67.
4. This Court further held a status hearing on September 1, 2021, in which the Plaintiffs on each consolidated case were asked about the potential changes to their claims should the new legislative map be signed by the Governor. The Plaintiffs in this case advised that the claims in the current amended complaint might be again amended after they had time to review and confirm.
5. Given the uncertainty of the claims as they stand, the Representative seeks to withdraw her Motion to Intervene without prejudice such to allow her leave to file an Amended Motion to Intervene upon the filing of a Second Amended Complaint, responsive pleadings, or other relevant pleadings or orders in the case.

WHEREFORE, the Representative prays this Court grant her Motion to Withdraw her Motion to Intervene without prejudice and for such other relief as this Court deems just and equitable.

Respectfully Submitted,

ANGELICA GUERRERO-CUELLAR

By: /s/ Veronica Bonilla-Lopez

Veronica Bonilla-Lopez

One of the Petitioner- Defendant's Attorneys

Veronica Bonilla-Lopez (ARDC# 6281050)

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