

IN THE U.S. SUPREME COURT

Appeal No. 131353

MINDY HARRIS,

Petitioner

v.

ROBERT HARRIS,

Respondent.

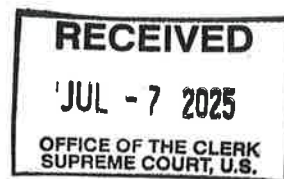
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MOTION FOR AN EXTENSION OF TIME TO FILE A PETITION FOR WRIT OF CERTIORARI

MOTION FOR AN EXTENSION OF TIME TO FILE A PETITION FOR WRIT OF CERTIORARI

NOW COMES the Petitioner, Rabbi Robert Harris, 70, sui juris, "pro se", respectfully moves this Honorable Court for an Extension of time to File a Petition for Writ of Certiorari in order for Robert Harris to obtain counsel. In support thereof, the Petitioner states as follows:

1. **Nature of the Case:** This case arises from the wrongful unconstitutional, vague and unsupported by any citation, to authority, final an appeal decisions (**Appendix 1**) issued by the Illinois Supreme Court issued on on January 01-31-25, May 28, 2025 and June 18, 2025, improperly dismissing the Petitioners Appeal, of a First District Appellate Court's wrongful, vague and unsupported by any citation, to authority, decisions, which constitutes **final judgment(s)** of the highest court of the State of Illinois, thereby satisfying the jurisdictional requirements under **28 U.S.C. § 1257** for further appeal to the United States Supreme Court.



1. An extension of time will allow Petitioner the necessary opportunity to secure competent legal representation and to prepare a thorough and well-supported petition that fully addresses the important legal issues presented.
2. This request is made in good faith and not for purposes of delay. No prejudice will result to Respondent from the requested extension.
3. **Relief Sought:** Petitioner seeks a request for an Extension of time up and until October 20th 2025 to acquire an attorney to file his Petition for Writ of Certiorari.

WHEREFORE, the Petitioner respectfully requests that this Honorable Court grant Petitioner's Motion for an Extension of Time up and until October 20th, 2025 to acquire counsel and file Petitioner's Petition for Writ of Certiorari and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Respectfully Submitted,
/s/ Rabbi Robert Harris
6933 N. Kedzie Ave.
Chicago, Illinois 60645

SUPPORTING RECORD
VERIFICATION

Under penalties as provided by law under Illinois Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, and as much matters, the undersigned certifies as aforesaid that I verify believe the same to be true. That the parties were in fact served upon the dates stated and that the Documents attached hereto are true and correct documents from the record.


_____ 06-18-25

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that on the **18th day of June 2025** there was filed with the Clerk of the United States Supreme Court, 1 First Street N.E., Washington, DC, 20543-0001, the attached **1) Notice of filing an Application For Extension of Time to File Petitioner's Petition for Writ of Certiorari**

Respectfully Submitted,

/s/ Rabbi Robert Harris
6933 N. Kedzie Ave.
Chicago, Illinois 60645

Certificate of Service

I caused the foregoing to be served by first class mailed the 06-18-25, to the parties listed, with the U.S. Postal Service with proper postage prepaid..

SERVICE LIST

Law Office of Sheryl B. Dworkin
77 W Washington St, Ste 900
Chicago, IL 60602
Phone: 312-759-8080
Email: sdworkin@aol.com

ILLINOIS §1-109 VERIFICATION

BY Under penalties as provided by law pursuant to § 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true. The Documents attached hereto are copies of originals. The document was served as described

/s/Robert Harris 6-18-25

IN THE UNITED STATES SUPREME COURT

Appeal No. _____

MINDY HARRIS,)	
)	
Petitioner)	
)	
v.)	
)	
ROBERT HARRIS,)	
)	
Respondent.)	

ORDER

This matter coming to be heard on Petitioner/Appellant Rabbi Robert Harris ,
Request for an additional **60 day Extension** of Time to retain counsel and /or to
file his Petition for Leave. The Court being fully advised in the premises.

IT IS HEREBY ORDERED

Petitioner's Motion to for a Extension of Time is **GRANTED/DENIED**
Petitioner is given up and until 10-25-2025 to retain counsel and/or to file his
opening brief.

ENTERED:

SUPPORTING RECORD
VERIFICATION

Under penalties as provided by law under Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, and as much matters, the undersigned certifies as aforesaid that I verify believe the same to be true. That the parties were in fact served upon the dates stated and that the Documents attached hereto are true and correct documents from the record.

/s/Rabbi Robert Harris 06-18-25

APPENDIX 1



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

June 18, 2025

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

Robert Harris
6933 N. Kedzie Ave.
Chicago, IL 60645

In re: Harris v. Kamerlink
131353

Today the following order was entered in the captioned case:

Motion by Petitioner, *pro se*, for clarification of this Court's order of May 28, 2025. Denied.

Order entered by the Court.

Very truly yours,

Cynthia A. Grant

Clerk of the Supreme Court

cc: Sheryl Beth Dworkin



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721
(217) 782-2035

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

May 28, 2025

In re: Mindy Harris v. Robert Harris, petitioner (Lydia Kamerlink, respondent). Leave to appeal, Appellate Court, First District.
131353

The Supreme Court today DENIED the Petition for Leave to Appeal in the above entitled cause.

The mandate of this Court will issue to the Appellate Court on 07/02/2025.

Very truly yours,

A handwritten signature in black ink that reads "Cynthia A. Grant". The signature is written in a cursive style.

Clerk of the Supreme Court



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

January 31, 2025

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

Robert Harris
6933 N. Kedzie Ave.
Chicago, IL 60645

In re: Harris v. Kamerlink
131353

Today the following order was entered in the captioned case:

Emergency motion by Petitioner, *pro se*, for sanctions pursuant to
Supreme Court Rule 375. Denied.

Order entered by the Court.

Very truly yours,

A handwritten signature in cursive script that reads "Cynthia A. Grant".

Clerk of the Supreme Court

cc: Sheryl Beth Dworkin

2024 IL App (1st) 240290-U

No. 1-24-0290

Order filed December 16, 2024.

First Division

IN THE
APPELLATE COURT OF ILLINOIS
FIRST DISTRICT

MINDY HARRIS,)	Appeal from the
)	Circuit Court of
Petitioner,)	Cook County.
)	
v.)	
)	
ROBERT HARRIS,)	07 D 2030250
)	
Respondent-Appellant,)	
)	
(Lydia Kamerlink,)	The Honorable
)	Jeanne M. Reynolds,
Intervenor-Appellee).)	Judge Presiding

JUSTICE LAVIN delivered the judgment of the court.
Justices Pucinski and Cobbs concurred in the judgment.

SUMMARY ORDER

¶ 1

NATURE OF THE CASE

¶ 2 On January 30, 2024, the circuit court denied respondent-appellant “Rabbi” Robert Harris’ motion to reconsider his request for a substitution of judge as of right and change of venue. Robert, acting *pro se*, subsequently appealed. Robert now challenges the denial of those motions and, according to his notice of appeal, the trial court’s orders from November 6 and July 20, 2023. Robert contends he was entitled to a substitution of judge as a matter of right because

the proceeding related to revived judgments for attorneys fees (which Robert admits total over \$20,000) owed to plaintiff-appellee attorney Lydia Kamerlink, who represented Robert's former wife Mindy in their dissolution case. Robert claims the recent proceeding to revive fees was separate and distinct from the underlying dissolution case. See 735 ILCS 5/2-1001(a)(2) (West 2022). Lydia, through private counsel, responds that the attorneys fees flowed from multiple civil contempt orders and sanctions entered against Robert during the lengthy post-dissolution proceedings. Lydia argues that the fees are mandated by section 508 of the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/508 (2022)) and therefore the circuit court has already entered substantive rulings in the proceedings, which are ongoing, thus vitiating Robert's entitlement to substitution of judge as a matter of right.

¶ 3 However, for the reasons identified below, Robert's brief fails to conform with Illinois Supreme Court Rule 341 (eff. Oct. 1, 2020) and the record is incomplete, thereby impeding further review.

¶ 4 ANALYSIS

¶ 5 Illinois Supreme court rules governing practice in the appellate court are mandatory, not suggestive. *Perona v. Volkswagen of America, Inc.*, 2014 IL App (1st) 130748, ¶ 21. Even a party appealing *pro se* must comply with established rules of appellate procedure (*Lill Coal Co. v. Bellario*, 30 Ill. App. 3d 384, 385 (1975)) and provide a record of the trial court proceedings sufficient to allow the appellate court to review the issues raised on appeal (*Rock Island County v. Boalbey*, 242 Ill. App. 3d 461, 462 (1993)). This court may, in its discretion, strike a brief and dismiss an appeal based on a failure to comply with those rules. *McCann v. Dart*, 2015 IL App (1st) 141291, ¶ 12.

¶ 6 When reviewing a case, the appellate court starts with the presumption that the circuit court's ruling was in conformity with the law and the facts. See *McCann*, 2015 IL App (1st) 141291, ¶ 15. The appellant bears the burden of overcoming that presumption and providing a sufficiently complete record to establish error; any doubts which may arise from the incompleteness of the record will be resolved against the appellant. *Foutch v. O'Bryant*, 99 Ill. 2d 389, 391-92 (1984); *McCann*, 2015 IL App (1st) 141291, ¶ 15.

¶ 7 Here, the record includes three volumes of common law record consisting of over 3,000 pages. As such, there is no report of proceedings, bystander's report, or agreed statement of facts (see Rule 323 (eff. July 1, 2017)) reflecting what took place at the November 6, 2023, hearing, or at the January 30, 2024, hearing, of which Robert now complains. See *Boalbey*, 242 Ill. App. 3d at 462. Without a record of the court's findings and the arguments or evidence presented, we must presume that the judgment entered by the trial court was in conformity with law and had a sufficient factual basis. See *Foutch*, 99 Ill. 2d at 392; *Doe v. Readey*, 2023 IL App (1st) 230867, ¶ 36 (noting, a reviewing court is limited to the record before it and cannot speculate about what may have occurred in the trial court); see also *In re Marriage of Katsap*, 2022 IL App (2d) 210706, ¶ 99 (noting, a motion to substitute must be filed before the trial judge has ruled on any substantial issue in the case).

¶ 8 We also observe that Robert's brief fails to conform to the requirements of Rule 341. Notably, Rule 341(h)(4) requires an appellant to provide a brief but precise statement of jurisdiction explaining the basis for the appeal and identifying the corresponding supreme court rule or other law conferring jurisdiction, and the applicable facts as to jurisdiction. Robert's statement of jurisdiction does none of these things.

¶ 9 First, Robert's jurisdictional statement does not identify the judgments or orders from which he is appealing. Second, it is unclear which rule he is operating under. Robert cites Rules 301 (eff. February 1, 1994) and 303 (eff. July 1, 2017), allowing appeals filed within 30 days from a final judgment or from the order disposing of a postjudgment motion directed against that final judgment. However, Robert also cites Rule 304(a), allowing interlocutory appeals from "a final judgment as to one or more but fewer than all of the parties or claims only if the trial court has made an express written finding that there is no just reason for delaying either enforcement or appeal or both." Ill. S. Ct. R. 304(a) (eff. March 8, 2016). He fails to demonstrate the trial court made a Rule 304(a) finding, which is essential to an appeal under that rule.¹ See *John G. Phillips & Associates v. Brown*, 197 Ill. 2d 337, 341 (2001); *Harreld v. Butler*, 2014 IL App (2d) 131065, ¶ 17. Third, he cites to a non-existent page number in the common law record to support his claimed jurisdiction before this court. As such, Robert has failed to provide any clear basis for this court's jurisdiction, which alone is sufficient to dismiss the appeal. *R.W. Duntelman Co. v. C/G Enterprises, Inc.*, 181 Ill. 2d 153, 159 (1998) ("[a] reviewing court must be certain of its jurisdiction prior to proceeding in a cause of action" *Hall v. Naper Gold Hospitality LLC*, 2012 IL App (2d) 111151, ¶ 8 ("an accurate jurisdictional statement is necessary to the orderly administration of justice").

¶ 10 Under Rule 341(h)(6), the appellant's statement of facts must contain facts necessary for understanding the case, stated accurately and fairly without argument or comment, and with citation to the record. See *Hall*, 2012 IL App (2d) 111151, ¶ 9. Robert's fact section consists of eight short bullet points of procedural background. He has not provided a factual statement containing a cohesive picture of what took place at the relevant hearings, including the

¹Indeed, the order entered January 30, 2024, does not reflect any 304(a) language, although the record indicates the proceedings continued.

arguments or evidence presented. See *In re Marriage of Foster*, 2014 IL App (1st) 123078, ¶ 72. He also cites only the slender appendix attached to his brief without any parallel citations to the record. It is the appellant's burden to show that his assertions are supported by *the record on appeal*, not by documents appended to his brief. Ill. S. Ct. R. 341(h)(6) (eff. Oct. 1, 2020). Given the three-volume record, consisting of over 3,000 thousand pages, Robert's practice is simply unacceptable. Robert thus has not submitted a proper fact section with relevant details under Rule 341(h)(6).

¶ 11 Rule 341(h)(7) requires the appellant to set forth his contentions on appeal and the reasons therefor, with citation to the authorities and the pages of the record relied on for each point. Again, Robert relies on his appendix without proper citation to the record on appeal. See *McCann*, 2015 IL App (1st) 141291, ¶ 15. Robert makes various arguments that lack organization, clarity, and any citation to legal authority, in violation of Rule 341(h)(7). For example, he argues the appellee has no "standing" but fails to support the argument with case law or facts. He also makes a passing reference to his motion to change venue without any argument or citation to authority. He sometimes writes in run-on and incomplete sentences. Robert's attempts to remedy any deficiencies in his reply brief fail. See Ill. S. Ct. R. 341(h)(7) (eff. Oct. 1, 2020) ("Points not argued are forfeited and shall not be raised in the reply brief, in oral argument, or on petition for rehearing").

¶ 12 This court is not a repository for an appellant to foist the burden of argument and research. *Cimino v. Sublette*, 2015 IL App (1st) 133373, ¶ 3. Nor is it the obligation of this court to act as an advocate or seek error in the record. *U.S. Bank v. Lindsey*, 397 Ill. App. 3d 437, 459 (2009). Our docket is full, and noncompliance with the rules does not help us resolve appeals expeditiously. *Hall*, 2012 IL App (2d) 111151, ¶ 15. As Robert has not complied with the rules

of this court, Lydia may choose to seek attorneys fees for defending against this appeal in the trial court. See 750 ILCS 5/508(a)(3), (6) (West 2022).

¶ 13

CONCLUSION

¶ 14 Based on the foregoing, Robert has failed to provide an adequate record for review or an adequate appellate brief. We therefore dismiss this appeal. See *Perona*, 2014 IL App (1st) 130748, ¶ 21; *Bellarino*, 30 Ill. App. 3d at 385. This order is entered under Illinois Supreme Court Rule 23(c)(2) (eff. Jan. 1, 2021).

¶ 15 Appeal Dismissed.