

IN THE SUPREME COURT OF THE UNITED STATES

EHAB ALLABABIDI, *Applicant*, v. **MATT JUNKIN**, Adult Probation Officer, Lake County; **MARGARET K. FONTANA**, Director, Division of Adult Probation Services, 19th Judicial Circuit (Lake County); and **CHIEF ADULT PROBATION OFFICER**, Cook County, *Respondents*.

Emergency Application No. _____ (To Be Assigned)

**APPENDIX TO EMERGENCY APPLICATION
FOR AN INJUNCTION PENDING APPELLATE REVIEW**
Submitted Pursuant to Supreme Court Rule 23.3

APPENDIX INDEX

PART I — ORDERS AND PROCEEDINGS BELOW

- A** — Order of the United States Court of Appeals for the Seventh Circuit (June 8, 2026)
- B** — Order of the United States Court of Appeals for the Seventh Circuit (June 4, 2026)
- C** — Minute Order of the United States District Court for the Northern District of Illinois (May 29, 2026)
- D** — Minute Order of the United States District Court for the Northern District of Illinois (May 28, 2026)
- E** — Perfected Notice of Interlocutory Appeal & Accompanying District Court Order (June 5, 2026)
- F** — Emergency Motion for Injunction Pending Appeal (June 8, 2026)

PART II — THE STATE’S INSTRUMENTS AND THE DISPOSITIVE CONTRADICTION

- G** — Written Adjudication of Compliance by the State’s Probation Officer (December 10, 2025)
- H** — State’s Petition for Revocation of Probation (May 14, 2026)
- I** — Pitney Bowes Digital Meter Stamp (Envelope Forensics)
- J** — Warrant Minute Entry (May 28, 2026)
- K** — Warrant of Arrest (May 28, 2026)

PART III — THE CLOSED STATE FORUM

- L** — Lake County Clerk Rejection Email (June 8, 2026)
- M** — Applicant’s Formal Response Demanding Court Appearance & Zoom Access (June 8, 2026)
- N** — Department Chief’s Written Confirmation of the Filing Refusal and the Unanswered June 9 Emergency Call (June 8–9, 2026)

PART IV — IN FORMA PAUPERIS AND RULE 4 SCREENING ORDERS

- O** — District Court Order Granting In Forma Pauperis and Finding the Claims Cognizable Under Rule 4 — No. 1:26-cv-01077, Dkt. 11 (April 13, 2026)
- P** — District Court Order Granting In Forma Pauperis and Finding the Claims Cognizable Under Rule 4 — No. 1:25-cv-15181, Dkt. 11 (April 13, 2026)

Full descriptions of each appendix appear on the respective divider pages within. Total pages in Appendix (including cover and divider pages): 55

APPENDIX A

Order of the United States Court of Appeals for the Seventh Circuit (June 8, 2026)

The final order under review. The Seventh Circuit denied Applicant's Emergency FRAP 8 Motion and summarily dismissed perfected Appeal No. 26-2212 as frivolous under United States v. Fortner, in reliance on Younger v. Harris—within twenty-four hours of docketing, without merits briefing or oral argument. With this order, every avenue of federal review below this Court was exhausted.

Allababidi v. Junkin, Fontana, and Chief Adult Probation Officer
Emergency Application No. _____ | Supreme Court of the United States

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Everett McKinley Dirksen
United States Courthouse
Room 2722 - 219 S. Dearborn Street
Chicago, Illinois 60604



Office of the Clerk
Phone: (312) 435-5850
www.ca7.uscourts.gov

ORDER

June 8, 2026

Before

DIANE S. SYKES, *Circuit Judge*
THOMAS L. KIRSCH II, *Circuit Judge*
CANDACE JACKSON-AKIWUMI, *Circuit Judge*

No. 26-2212	EHAB ALLABABIDI, Petitioner - Appellant v. MATT JUNKIN and MARGARET K. FONTANA, Respondents - Appellees
Originating Case Information:	
District Court No: 1:26-cv-01077 Northern District of Illinois, Eastern Division District Judge John Robert Blakey	

Upon consideration of the **EMERGENCY MOTION FOR INJUNCTION PENDING APPEAL PURSUANT TO FED. R. APP. P. 8(a)(2)**, filed on June 8, 2026, by the pro se appellant,

IT IS ORDERED that the motion is **DENIED**.

IT IS FURTHER ORDERED that this appeal is **DISMISSED** as frivolous. Summary disposition is appropriate where any arguments an appellant could raise are “incomprehensible or completely insubstantial.” *United States v. Fortner*, 455 F.3d 752, 754 (7th Cir. 2006). The district court did not abuse its broad discretion in denying the request for injunctive relief from arrest and refusing to interfere with ongoing state-court proceedings. *See Younger v. Harris*, 401 U.S. 37, 45–46 (1971).

form name: c7_Order_3J (form ID: 177)

APPENDIX B

Order of the United States Court of Appeals for the Seventh Circuit (June 4, 2026)

*The first dismissals. The Seventh Circuit dismissed Appeal No. 26-2162 as premature because the notice of appeal preceded formal entry of judgment, and dismissed Appeal No. 26-2163 as frivolous on the ground—per *Sherwood v. Marquette Transportation Co.*—that the order under review was an unappealable ‘stay.’ Applicant cured the prematurity defect the next day by filing the perfected appeal docketed as No. 26-2212—which the court then dismissed as frivolous (Appendix A). No court has reached the merits at any step.*

Allababidi v. Junkin, Pontana, and Chief Adult Probation Officer
Emergency Application No. _____; Supreme Court of the United States

Everett McKinley Dirksen
 United States Courthouse
 Room 2722 - 219 S. Dearborn Street
 Chicago, Illinois 60604



Office of the Clerk
 Phone: (312) 435-5850
 www.ca7.uscourts.gov

ORDER

June 4, 2026

Before

DIANE S. SYKES, *Circuit Judge*
 THOMAS L. KIRSCH II, *Circuit Judge*
 CANDACE JACKSON-AKIWUMI, *Circuit Judge*

No. 26-2162	EHAB ALLABABIDI, Petitioner - Appellant v. MATT JUNKIN and MARGARET K. FONTANA, Respondents - Appellees
Originating Case Information:	
District Court No: 1:26-cv-01077 Northern District of Illinois, Eastern Division District Judge John Robert Blakey	
No. 26-2163	EHAB ALLABABIDI, Petitioner - Appellant v. CHIEF ADULT PROBATION OFFICER, Respondent - Appellee
Originating Case Information:	
District Court No: 1:25-cv-15181 Northern District of Illinois, Eastern Division District Judge John Robert Blakey	

The following are before the court:

1. **NOTICE OF PERFECTED JURISDICTION AND EXECUTED WARRANT**, filed on June 1, 2026, in appeal no. 26-2162, by the pro se appellant.
2. **EMERGENCY MOTION FOR INJUNCTION PENDING APPEAL**, filed on June 1, 2026, in appeal no. 26-2162, by the pro se appellant.
3. **APPELLANT'S UNOPPOSED MOTION TO CONSOLIDATE APPEALS PURSUANT TO FED. R. APP. P. 3(b)(2)**, filed on June 2, 2026, by the pro se appellant.

Nos. 26-2162 & 26-2163

Page 2

IT IS ORDERED that the motion to consolidate appeal nos. 26-2162 and 26-2163 is **GRANTED** to the extent that the appeals are consolidated for purposes of disposition.

IT IS FURTHER ORDERED that the motion for an injunction pending appeal is **DENIED** and these appeals are **DISMISSED**.

Appeal no. 26-2162 is premature. Although 28 U.S.C. § 1292(a)(1) permits appeal from “interlocutory orders ... refusing ... injunctions,” here the district court denied appellant’s motion for a preliminary injunction on May 29, 2026. Under Rule 4(a)(2) of the Federal Rules of Appellate Procedure, a notice of appeal filed after the court announces a decision or order—but before the entry of the judgment or order—is treated as filed on the date of and after the entry. See *FirsTier Mortg. Co. v. Invs. Mortg. Ins. Co.*, 498 U.S. 269, 276 (1991). The district court had not yet announced its decision on the motion for a preliminary injunction when this notice of appeal was filed on May 27, 2026.

Appellant appears to contend that by not yet ruling on the motion for preliminary injunction he filed on May 21, 2026, the district court had in effect refused the injunction on May 27. Review is possible in the absence of an order expressly refusing an injunction “[o]nly when resort to the regular processes of litigation is unavailing, and the judge is unwilling to make a prompt decision even though delay erodes or obliterates the rights in question.” *Cnty., Mun. Employees’ Supervisors’ & Foremen’s Union Loc. 1001 (Chicago Illinois) v. Laborers’ Int’l Union of N. Am.*, 365 F.3d 576, 578 (7th Cir. 2004); accord *In re Fort Worth Chamber of Com.*, 100 F.4th 528, 535 (5th Cir. 2024) (“[W]hat counts as an effective denial is contextual—different cases require rulings on different timetables.”). This timeline does not suggest that the district court’s delay in ruling had eroded or obliterated any of appellant’s rights on May 27.

Further, appeal no. 26-2163 is frivolous. Summary disposition is appropriate where any arguments an appellant could raise are “incomprehensible or completely insubstantial.” *United States v. Fortner*, 455 F.3d 752, 754 (7th Cir. 2006). The district court did not abuse its broad discretion in denying any request for injunctive relief from arrest and refusing to interfere with ongoing state-court proceedings. See *Younger v. Harris*, 401 U.S. 37, 45–46 (1971). And the denial of a stay of litigation is not generally appealable prior to entry of final judgment. See *Sherwood v. Marquette Transp. Co., LLC*, 587 F.3d 841, 844 (7th Cir. 2009).

APPENDIX C

Minute Order of the United States District Court for the Northern District of Illinois (May 29, 2026)

The principal Younger abstention order. Judge Blakey denied Applicant's Emergency TRO/Preliminary Injunction [Dkt. 25 in Case No. 1:26-cv-01077] on abstention grounds without holding an evidentiary hearing on the documented bad-faith exception—and therefore without examining the written compliance adjudication (Appendix G) that contradicts the sworn Petition (Appendix H).

Allababidi v. Junkin, Fontana, and Chief Adult Probation Officer
Emergency Application No. _____; Supreme Court of the United States

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.9 (rev. 1.9)
Eastern Division**

Ehab Allababidi

Plaintiff,

v.

Case No.: 1:26-cv-01077

Honorable John Robert Blakey

Matt Junkin

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Friday, May 29, 2026:

MINUTE entry before the Honorable John Robert Blakey: Petitioner filed an "emergency motion for temporary restraining order and preliminary injunction," [16], claiming that Lake County prosecutors are moving to revoke his supervision in retaliation for filing the instant lawsuit; he seeks an order barring the state case from proceeding and also claims he will be unable to defend his case while detained. Initially, detainees traditionally and consistently litigate their cases while in custody, and his claim of being unable to litigate his case while in jail remains frivolous. Moreover, federal courts may generally not interfere with state court proceedings, see *Younger v. Harris*, 401 U.S. 37 (1971). If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance. The Court admonishes Plaintiff that he should refrain from filing pleadings beyond his reply in support of the habeas corpus petition without leave of Court. Additionally, the Office of the Illinois Attorney General has filed a notice of non-involvement [12] and no one from the Office of the Lake County State's Attorney has appeared. The Court, on its own motion, extends Respondent's responsive pleading deadline to 7/10/26, and directs the Clerk to mail a copy of this order to Eric F. Rinehart, State's Attorney, Lake County, 18 N. County Street, 3rd Floor, Waukegan, IL 60085. The Clerk shall also email a copy of this order to statesattorney@lakecountyil.gov. Mailed notice. (evw,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at www.ilnd.uscourts.gov.

APPENDIX D

Minute Order of the United States District Court for the Northern District of Illinois (May 28, 2026)

The companion abstention order. Judge Blakey denied emergency relief in the coordinate docket [Dkt. 17 in Case No. 1:25-cv-15181] under the same Younger rationale, again without an evidentiary hearing on bad faith. This order was appealed as part of the consolidated No. 26-2163.

Allababidi v. Junkin, Fontana, and Chief Adult Probation Officer
Emergency Application No. _____ Supreme Court of the United States

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.9 (rev. 1.9)
Eastern Division**

Ehab Allababidi

Plaintiff,

v.

Case No.: 1:25-cv-15181

Honorable John Robert Blakey

Chief Adult Probation Officer

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Thursday, May 28, 2026:

MINUTE entry before the Honorable John Robert Blakey: Petitioner filed a "notice of related emergency filing and conditional motion to toll deadline in the event of state sponsored custodial interference," [16], claiming that Lake County prosecutors are moving to revoke his supervision, allegedly in retaliation for filing a lawsuit in this Court. He seeks an order barring the state case from proceeding and claims he will be unable to defend his case while detained. The Court denies the motion [16]. Initially, detainees traditionally and consistently litigate their cases while in custody, and his claim of being unable to litigate his case while in jail remains frivolous. Moreover, federal courts may generally not interfere with state court proceedings, see *Younger v. Harris*, 401 U.S. 37 (1971). If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance. The Court admonishes Plaintiff that he should refrain from filing pleadings beyond his reply in support of the habeas corpus petition without leave of Court. Mailed notice. (evw,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at www.ilnd.uscourts.gov.

APPENDIX E

Perfecting Notice of Interlocutory Appeal & Accompanying District Court Order (June 5, 2026)

The cured appeal. This perfected Notice of Interlocutory Appeal in Case No. 1:26-cv-01077 remedied the prematurity defect identified in Appendix B and invoked the appeal of right from injunction denials under 28 U.S.C. § 1292(a)(1). It was docketed as Seventh Circuit Appeal No. 26-2212 and dismissed the following day (Appendix A), before any briefing schedule issued.

Allababidi v. Junkin, Fontana, and Chief Adult Probation Officer
Emergency Application No. _____ | Supreme Court of the United States

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

EHAB ALLABABIDI,
Petitioner-Appellant, Pro Se,

v.

MATT JUNKIN, Adult Probation Officer, Lake
County;

MARGARET K. FONTANA, Director,
Division of Adult Probation Services,
19th Judicial Circuit (Lake County);
Respondents-Appellees.

Case No.: **1:26-cv-01077**

Judge: *Hon. John Robert Blakey*
7th Cir. No.: *(To Be Assigned)*

**INTERLOCUTORY APPEAL UNDER
28 U.S.C. § 1292(a)(1)**

**NOTICE OF INTERLOCUTORY APPEAL PURSUANT TO
28 U.S.C. § 1292(a)(1)**

NOTICE IS HEREBY GIVEN

Notice is hereby given that Petitioner-Appellant Ehab Allababidi appeals to the United States Court of Appeals for the Seventh Circuit from the District Court's May 29, 2026 Minute Order [Dkt. 25 in N.D. Ill. Case No. 1:26-cv-01077] denying Petitioner's Emergency Motion for Temporary Restraining Order and Preliminary Injunction [Dkt. 16 in N.D. Ill. Case No. 1:26-cv-01077].

JURISDICTIONAL STATEMENT AND PROCEDURAL CURE

This Court possesses jurisdiction over this interlocutory appeal as of right pursuant to 28 U.S.C. § 1292(a)(1), which expressly grants appellate jurisdiction over interlocutory orders refusing injunctions.

This Notice of Appeal is timely filed pursuant to Fed. R. App. P. 4(a)(1)(A). On June 4, 2026, the Seventh Circuit Court of Appeals dismissed a prior, protective Notice of Appeal (Appeal No. 26-2162, previously docketed from N.D. Ill. Case No. 1:26-cv-01077) strictly as premature under Fed. R. App. P. 4(a)(2), noting that the Notice of Appeal was filed on May 27, 2026, prior to the District Court's formal entry of judgment. The District Court subsequently entered its formal denial on the docket on May 29, 2026 [Dkt. 25 in N.D. Ill. Case No. 1:26-cv-01077].

The filing of this instant Notice cures the procedural defect identified by the Seventh Circuit. It is filed within 30 days of the May 29, 2026 formal entry, perfecting appellate jurisdiction over the District Court's refusal to enjoin a state revocation proceeding that is operating in documented bad faith, infected by *Napue* perjury, and mathematically timed to force a jurisdictional default of this federal habeas docket.

A true and correct copy of the May 29, 2026 Minute Order [Dkt. 25 in N.D. Ill. Case No. 1:26-cv-01077] is attached hereto as Exhibit A and incorporated by reference.

IN FORMA PAUPERIS STATUS (FED. R. APP. P. 24(a)(3))

Petitioner-Appellant was granted leave to proceed In Forma Pauperis by the District Court on April 13, 2026 (N.D. Ill. Case No. 1:26-cv-01077, Dkt. 11). Pursuant to Federal Rule of Appellate Procedure 24(a)(3), Petitioner-Appellant's pauper status automatically continues on appeal without further authorization.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Petitioner-Appellant

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: June 5, 2026

CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify under penalty of perjury that on this date, I caused this Notice of Interlocutory Appeal to be filed with the Clerk of the United States District Court for the Northern District of Illinois via the Pro Se filing portal, which transmits electronic notice to all parties of record.

Copies were also served via email upon:

Katherine M. Doersch, Assistant Attorney General

Criminal Appeals Division / Federal Habeas

Office of the Illinois Attorney General

100 W. Randolph St., 12th Floor, Chicago, IL 60601

Email: katherine.doersch@ilag.gov

Nicholas Shepherd, Assistant State's Attorney

Lake County State's Attorney's Office

18 N. County Street, Waukegan, IL 60085

Email: nshepherd@lakecountyil.gov

Executed under Fed. R. App. P. 3 and Fed. R. Civ. P. 5(b)(2)(E).

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Petitioner-Appellant

Dated: June 5, 2026

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.9 (rev. 1.9)
Eastern Division**

Ehab Allababidi

Plaintiff,

v.

Case No.: 1:26–cv–01077

Honorable John Robert Blakey

Matt Junkin

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Friday, May 29, 2026:

MINUTE entry before the Honorable John Robert Blakey: Petitioner filed an "emergency motion for temporary restraining order and preliminary injunction," [16], claiming that Lake County prosecutors are moving to revoke his supervision in retaliation for filing the instant lawsuit; he seeks an order barring the state case from proceeding and also claims he will be unable to defend his case while detained. Initially, detainees traditionally and consistently litigate their cases while in custody, and his claim of being unable to litigate his case while in jail remains frivolous. Moreover, federal courts may generally not interfere with state court proceedings, see *Younger v. Harris*, 401 U.S. 37 (1971). If Petitioner has legitimate concerns about the state case he must raise them with the state court in the first instance. The Court admonishes Plaintiff that he should refrain from filing pleadings beyond his reply in support of the habeas corpus petition without leave of Court. Additionally, the Office of the Illinois Attorney General has filed a notice of non-involvement [12] and no one from the Office of the Lake County State's Attorney has appeared. The Court, on its own motion, extends Respondent's responsive pleading deadline to 7/10/26, and directs the Clerk to mail a copy of this order to Eric F. Rinehart, State's Attorney, Lake County, 18 N. County Street, 3rd Floor, Waukegan, IL 60085. The Clerk shall also email a copy of this order to statesattorney@lakecountyil.gov. Mailed notice. (evw,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at www.ilnd.uscourts.gov.

APPENDIX F

Emergency Motion for Injunction Pending Appeal (June 8, 2026)

Applicant's 43-page Emergency FRAP 8 Motion filed in Seventh Circuit No. 26-2212, presenting the timestamped record of the attempted warrant executions, the Napue contradiction between the sworn Petition and the State's own compliance adjudication, the documented closure of the state forum, and the irreparable harm to coordinate federal dockets. It was denied within twenty-four hours, without merits briefing.

Allababidi v. Junkin, Fontana, and Chief Adult Probation Officer
Emergency Application No. _____ | Supreme Court of the United States

UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

<p>IN RE: EHAB ALLABABIDI,</p>	<p>No. 26-2212</p> <p>Originating N.D. Ill. Case No. 1:26-cv-01077 Hon. John Robert Blakey</p>
--------------------------------	--

**EMERGENCY MOTION FOR INJUNCTION PENDING APPEAL
PURSUANT TO FED. R. APP. P. 8(a)(2)**

EXPEDITED CONSIDERATION REQUESTED — ACTIVE CUSTODIAL WARRANT EXECUTED

**I. JURISDICTIONAL PERFECTION AND EXHAUSTION OF LOWER COURT
REMEDIES**

Petitioner-Appellant Ehab Allababidi moves this Court pursuant to Fed. R. App. P. 8(a)(2) and Seventh Circuit Rule 8 for an emergency injunction pending appeal.

Procedural Cure of Prior Dismissal: On June 4, 2026, this Court dismissed a prior, protective interlocutory appeal (Appeal No. 26-2162) strictly as premature under Fed. R. App. P. 4(a)(2), noting the Notice of Appeal was filed on May 27, 2026, prior to the District Court’s formal entry of judgment. The District Court subsequently entered its formal denial on the docket on May 29, 2026 [Dkt. 25 in N.D. Ill. Case No. 1:26-cv-01077]. Petitioner has filed a timely, perfected Notice of Appeal from that finalized May 29 order, curing the procedural defect and establishing absolute appellate jurisdiction under 28 U.S.C. § 1292(a)(1).

Exhaustion Satisfied: The District Court’s May 29, 2026 formal denial of injunctive relief [Dkt. 25] completely satisfies the district court exhaustion requirement of Fed. R. App. P. 8(a)(1). Further motion practice in the District Court is legally exhausted and functionally impossible.

Substantive Distinction from Appeal No. 26-2163: This motion strictly targets the District Court’s refusal to enjoin the Lake County State’s Attorney from executing a retaliatory arrest warrant. This is a direct appeal of a denied preliminary injunction under § 1292(a)(1), structurally distinct from the collateral Cook County stay request that this Court previously classified as unappealable under *Sherwood v. Marquette Transp. Co.*

II. FACTUAL IMPERATIVE: THE MAY 28 EXECUTED WARRANT

The threat of irreparable harm is no longer prospective. On May 28, 2026, the Lake County Circuit Court executed a no-bond arrest warrant against Petitioner in Case No. 23 CF 1146. This Court noted in

its June 4, 2026 order that the District Court’s delay had not “eroded or obliterated any of appellant’s rights on May 27.” That calculus is now obsolete. The warrant was issued on May 28, targeting Petitioner for immediate physical extraction based on a mathematically engineered, retaliatory proceeding.

III. LIKELIHOOD OF SUCCESS ON THE MERITS

The District Court erred by invoking a blanket *Younger v. Harris* abstention without conducting the mandatory evidentiary inquiry into the well-established bad-faith exception. Federal courts must intervene when a state proceeding is brought in bad faith or for purposes of harassment. *Dombrowski v. Pfister*, 380 U.S. 479, 490 (1965). The state proceeding is a verifiable sham, engineered to moot this coordinate federal habeas docket:

The Napue Perjury

The state’s May 14, 2026 Petition for Revocation is built upon a knowingly false allegation of a “positive amphetamine (illegal substance)” test. The coordinate Cook County Adult Probation Department formally adjudicated this exact test as compliant on December 10, 2025, confirming the result was attributable to a lawfully prescribed Adderall medication. Filing a sworn charging instrument containing a fabricated illegal substance allegation constitutes prosecutorial perjury in direct violation of *Napue v. Illinois*, 360 U.S. 264 (1959).

The Forensic Envelope: Pitney Bowes Metadata Proves Intentional Temporal Sabotage

The State’s bad faith is mathematically codified by the physical encryption and metadata stamped upon the service envelope of the Petition for Revocation (Appendix H). The chronology of the mailing envelope admits no innocent or administrative interpretation:

The Signing and Notarization (May 14, 2026): The face of the Petition and Summons confirms it was completed, signed by ASA Shepherd, and notarized by the state’s agent on Thursday, May 14, 2026.

The Pitney Bowes Batch Hold (May 15, 2026): The internal government Pitney Bowes postage meter (Meter No. 0000380874) printed postage on Friday, May 15, 2026. This metadata confirms that the physical instrument was fully prepared and within the exclusive custody of the state enforcement apparatus prior to the weekend.

The Carol Stream Injection Delay (May 18, 2026): The official United States Postal Service cancellation mark confirms the envelope did not enter the USPS Carol Stream processing facility until Monday, May 18, 2026, at 4:00 PM.

The Forensic Squeeze Deconstructed: In a fixed 14-day procedural interval between the drafting of the revocation charge (May 14) and the mandatory custodial extraction date (May 28), the state apparatus intentionally withheld the physical instrument for exactly four days—consuming 50% of the entire notice timeline in a state-controlled custody loop before dropping it into the mail stream. This calculation was intentionally combined with the Memorial Day federal holiday block (Monday, May 25, 2026), systematically compressing Applicant’s operational window to discover the charge, download the encrypted files, draft federal constitutional defenses, and navigate the N.D. Ill. Pro Se portal to exactly three business days (May 22, May 26, May 27).

This forensic metadata establishes that the state did not utilize routine administrative processes; they engineered a localized “Holiday Compression Trap” designed to ensure Applicant would remain completely unaware of the impending custodial extraction until federal emergency intervention windows had effectively expired. This is affirmative, documented proof of a bad-faith enforcement campaign designed exclusively to guarantee a default under *Dombrowski v. Pfister*.

Structural Impossibility

The State deliberately manufactured the “failure to report” defaults by utilizing an anonymous probation officer who refused to identify her supervising authority, subsequently downgrading reporting directives from commands to discretionary requests, and executing a complete prosecutorial communications blockade in violation of Illinois Supreme Court Rule 131(b).

III-A. THE PREDICTED APPELLATE EVASION VECTOR: *MIDDLESEX* PRONG 3 — PREEMPTIVELY DISMANTLED

Petitioner anticipates that this Court may attempt to bypass the *Napue* violation by invoking the third prong of the *Younger* abstention doctrine, derived from *Middlesex County Ethics Comm. v. Garden State Bar Ass’n*, 457 U.S. 423, 432 (1982). The predicted logic would be: acknowledge the “fabricated amphetamine test” allegation, assert that state courts are presumed competent to adjudicate federal constitutional defenses, and rule that Petitioner has an “adequate opportunity” to raise the *Napue* perjury defense before Judge Stride in the Lake County Circuit Court during the revocation proceedings. Such a ruling would be legally erroneous for three independently dispositive reasons:

1. The Lake County Circuit Court Lacks Subject-Matter Jurisdiction Over the Federal Claims at Issue

The third prong of *Middlesex* is mathematically unsatisfied. The Lake County Circuit Court hearing a probation violation possesses zero subject-matter jurisdiction to enforce a Fed. R. Civ. P. 37(e)

preservation hold or to manage the encrypted digital infrastructure underpinning Petitioner's coordinate federal Civil RICO docket (N.D. Ill. Case No. 1:25-cv-15800). A state court cannot enjoin a federal prosecutor from appearing before it. A state court cannot adjudicate an 18 U.S.C. § 1512(b) federal witness tampering charge against its own prosecutor. Directing Petitioner to litigate federal evidence destruction in a tribunal structurally incapable of granting relief is a violation of *Ex parte Young*, 209 U.S. 123 (1908). This Court cannot discharge its Article III duty by directing a litigant to a state tribunal that possesses no power to adjudicate the federal rights at issue.

2. The Custodial Extraction Executes the Harm Before Any State Hearing Can Occur

Raising the *Napue* defense at the revocation arraignment is structurally too late. The 9:00 AM custodial extraction itself executes the spoliation of Petitioner's digital infrastructure. The harm occurs the moment the warrant is executed — permanently severing access to the encrypted evidence underpinning the federal RICO action and mooted the federal habeas response deadline. A state court cannot cure a jurisdictional blackout after the physical extraction has already destroyed the federal ESI access. "Extraordinary circumstances" justifying federal intervention exist where the state proceeding is "conducted in bad faith or for the purpose of harassment." *Kugler v. Helfant*, 421 U.S. 117, 126 n.6 (1975). The bad faith is not alleged; it is mathematically proven.

3. Dombrowski Mandates Federal Intervention Where the State Proceeding Is Itself the Weapon

Under *Dombrowski v. Pfister*, 380 U.S. 479, 490 (1965), where a state proceeding is brought in bad faith or for harassment, the federal court is mandated to intervene. The bad-faith exception overrides the presumption of state court competence because the proceeding itself is the weapon. The Petition for Revocation is not a legitimate exercise of state police power; it is a retaliatory mechanism designed to moot a coordinate federal habeas docket. The state tribunal cannot be an "adequate forum" for adjudicating a perjury charge against its own prosecutor when the prosecutor's sole purpose in committing the perjury was to bypass that very tribunal's federal obligations.

This Court should reject any attempt to invoke the third prong of *Middlesex* as a basis for abstention. The state forum is not adequate as a matter of law. Abstention would constitute reversible error.

IV. IRREPARABLE HARM

Without immediate appellate intervention, the execution of the May 28, 2026 arrest warrant will trigger a catastrophic, irreversible sequence of constitutional and statutory deprivations:

18 U.S.C. § 1512(b) Witness Tampering & ESI Spoliation: The 9:00 AM custodial extraction is a weaponized evidence-destruction mechanism. Incarceration permanently severs Petitioner’s physical access to the highly encrypted digital infrastructure utilized to litigate the coordinate federal Civil RICO action (Case No. 1:25-cv-15800).

Jurisdictional Nullification: Physical detention strips Petitioner of computer access, electronic filing capability, and telephonic appearance capacity. The State will leverage this forced communications blackout to secure an uncontested default in the underlying federal habeas proceedings, permanently mooting this Court’s appellate jurisdiction before a merits review can occur.

Irreparable Harm: State-Engineered Spoliation of Federal Cyber-Intrusion Forensics: The state’s custodial extraction mathematically guarantees the permanent physical spoliation of cryptographic evidence in a coordinate, high-stakes federal cyber-intrusion docket, *Allababidi v. Tencent Cloud LLC, et al.* (N.D. Ill. Case No. 1:26-cv-03204).

Destruction of the FRE 902(14) Chain of Custody: Applicant is the Principal Investigator of a registered U.S. Defense Contractor (CAGE Code: 16QC7) currently prosecuting civil Computer Fraud and Abuse Act (CFAA) and Defend Trade Secrets Act (DTSA) claims against Tencent Cloud LLC. The evidence in that federal docket consists of raw, machine-readable forensic logs (e.g., BGP routing tables, Hyper-V virtual switch events, and DNS cache captures) stored on specific physical endpoints—a Patriot M.2 P300 NVMe workstation drive, a Samsung Galaxy S25 Ultra, and an iPhone 16 Pro Max. This evidence is permanently anchored via SHA-256 cryptographic hashes. The state’s execution of a custodial warrant will result in the physical seizure, mishandling, or forced abandonment of these devices. This state-engineered physical separation instantaneously and permanently destroys the strict chain of custody required for Federal Rule of Evidence 902(14) authentication.

Immunizing a Designated Foreign Adversary: The primary defendant in the coordinate federal action, Tencent Holdings Limited, was formally designated by the U.S. Department of Defense on January 6, 2025, as a Section 1260H Chinese Military Company. The federal courts will be structurally stripped of their capacity to adjudicate these CFAA and DTSA claims because the state probation apparatus is executing a 9:00 AM physical extraction that permanently severs Applicant’s access to the encrypted audit packages necessary to prove the cyberattack.

The Exacerbation of 18 U.S.C. § 1512(b): The state’s action does not merely default a habeas proceeding; it operates as an overt act of evidence spoliation under Fed. R. Civ. P. 37(e) and witness tampering under 18 U.S.C. § 1512(b). American federal courts will possess zero capacity to enforce cybersecurity accountability against Tencent Cloud LLC if local state actors are permitted to weaponize fabricated probation violations to physically incapacitate the federal plaintiff and spoliage the digital evidence.

V. BALANCE OF EQUITIES AND PUBLIC INTEREST

The State of Illinois suffers zero cognizable prejudice from a temporary injunction maintaining the status quo pending appellate review. The State retains all legal arguments regarding the revocation petition if this Court ultimately affirms the District Court. Conversely, the Petitioner faces the permanent destruction of his federal civil rights and the spoliation of evidence in coordinate federal dockets. The public interest strictly favors the protection of federal jurisdiction from state-engineered retaliation and the enforcement of the *Younger* bad-faith exception.

VI. RELIEF SOUGHT

Petitioner-Appellant respectfully demands that this Court:

- (1) Issue an immediate administrative stay pursuant to Fed. R. App. P. 8(a)(2) enjoining the State of Illinois, the Lake County State’s Attorney’s Office, and all coordinate law enforcement agencies from executing the arrest warrant in Lake County Case No. 23 CF 1146 pending this Court’s resolution of the perfected 28 U.S.C. § 1292(a)(1) appeal;
- (2) Direct the Appellees to show cause why the preliminary injunction should not be granted on the merits of the *Napue* perjury and bad-faith *Younger* exception.

Respectfully submitted,

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Petitioner-Appellant

8516 W. Winona St., Chicago, IL 60656

(773) 920-0030 | defcon5ready@gmail.com

Dated: June 5, 2026

CERTIFICATE OF SERVICE

I, EHAB ALLABABIDI, certify under penalty of perjury that on this date, I caused this Emergency Motion for Injunction Pending Appeal to be filed with the Clerk of the United States Court of Appeals

for the Seventh Circuit via direct electronic mail to USCA7_Clerk@ca7.uscourts.gov pending the generation of the appellate docket number. Copies were also served via email upon:

Katherine M. Doersch, Assistant Attorney General
Office of the Illinois Attorney General
100 W. Randolph St., 12th Floor, Chicago, IL 60601
Email: katherine.doersch@ilag.gov

Nicholas Shepherd, Assistant State's Attorney
Lake County State's Attorney's Office
18 N. County Street, Waukegan, IL 60085
Email: nshepherd@lakecountyil.gov

Executed under Fed. R. App. P. 25(d) and Fed. R. Civ. P. 5(b)(2)(E).

/s/ Ehab Allababidi

EHAB ALLABABIDI, *Pro Se* Petitioner-Appellant

Dated: June 5, 2026

APPENDIX G

Written Adjudication of Compliance by the State's Probation Officer (December 10, 2025)

The dispositive exhibit. In this December 10, 2025 written communication, Cook County Adult Probation Officer Adison Weeks records, in a single sentence, both the laboratory result and the verified prescription that makes it legally innocent: 'Your drug test results were positive for amphetamine, but it is all negative in my eyes because I know you are still taking the Adderall.' Five months later, the State's Petition swore to the first half of that sentence, characterized the substance as 'illegal,' and omitted the second half (Appendix H). The omitted half is the half that defeats the charge.

**Additional material
from this filing is
available in the
Clerk's Office.**