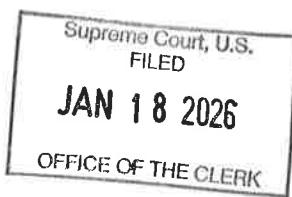


25A 873
EMERGENCY



EMERGENCY APPLICATION FOR INJUNCTION PENDING APPEAL

Supreme Court Rule 23

To the Honorable **Justice Amy Coney Barrett**, Circuit Justice for the Seventh Circuit:

Applicants Patricia L. Tillman and Joseph L. Mosley respectfully request an emergency injunction prohibiting the printing of ballots pending resolution of their federal appeal.

Applicants sought emergency relief in the district court, which was denied, and thereafter sought an emergency administrative stay and injunction pending appeal in the Seventh Circuit, which was denied or not acted upon in time to prevent ballot printing.

Absent immediate relief, ballot printing will irreversibly moot this case and deprive this Court of jurisdiction. No court can unprint ballots. *But can make them Reprint or freeze
Because of Holiday Ballots will Print* ^{PRINTING}

Applicants seek only a narrow, temporary injunction preserving the status quo.

This application is authorized by **Supreme Court Rule 23** and **28 U.S.C. § 1651**.

Patricia L. Tillman JANUARY 19, 2026

01-16-2026

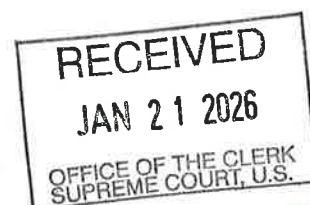
229 E 51st

Chicago IL 60615

PatriciaTillman@rocketmail.com

Tillman@FriendsofpatriciatillmanforGovernor.com

312-316-1305



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NOTICE OF EMERGENCY MOTION

SUPREME COURT OF THE UNITED STATES

PATRICIA L. TILLMAN and JOSEPH L. Mossley

**Candidates for Governor and Lieutenant Governor
Applicants,**

v.

**ILLINOIS STATE BOARD OF ELECTIONS; Et al
EXECUTIVE DIRECTOR OF THE ILLINOIS STATE BOARD OF ELECTIONS, in
official capacity;
MEMBERS OF THE ILLINOIS STATE BOARD OF ELECTIONS, in official capacities,**

Kevin M. Morphew of Sorling Northrup Attorneys

Attorney General Kwame Raoul

Assistant Attorney General Lee B. Stark

All in their Official and Individual Capacity

Respondents

****NOTICE OF EMERGENCY MOTION FOR INJUNCTION PENDING
APPEAL**

AND FOR IMMEDIATE ADMINISTRATIVE STAY**

**PLEASE TAKE NOTICE that Applicants Patricia Tillman and Joseph Movie hereby move
the Supreme Court of the United States, and the Honorable Amy Coney Barrett, Associate
Justice of the United States and Circuit Justice for the Seventh Circuit, for an Emergency
Injunction Pending Appeal and an Immediate Administrative Stay enjoining the Illinois
State Board of Elections from printing ballots for the March 17, 2026 Illinois primary election.**

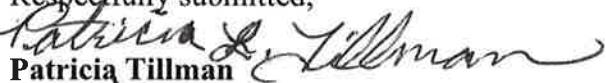
This Motion is made on the grounds that ballot printing is scheduled to occur within approximately **twenty-four (24) hours**, and that once ballots are printed, Applicants' exclusion from the ballot and voters' loss of choice will be **irreversible**, depriving this Court of the ability to grant meaningful relief.

This Motion is based upon the accompanying **Emergency Application, Statement of Irreparable Harm, Motion for Preservation of Evidence, Appendix, Declaration of Patricia Tillman, and Proof of Service**, together with all records and proceedings herein.

Applicants respectfully request **immediate consideration** of this Motion due to the imminent and irreparable harm posed by impending ballot printing.

DATED: January 16, 2026

Respectfully submitted,


Patricia Tillman
Applicant, Pro Se

**EMERGENCY APPLICATION FOR AN INJUNCTION PENDING APPEAL
AND FOR AN IMMEDIATE ADMINISTRATIVE STAY**

**TO THE HONORABLE AMY CONEY BARRETT,
ASSOCIATE JUSTICE OF THE UNITED STATES
AND CIRCUIT JUSTICE FOR THE SEVENTH CIRCUIT**

Applicants

Patricia L. Tillman and Joseph L. Mosley

Candidates for Governor and Lieutenant Governor

Respondents

Illinois State Board of Elections et, al

Executive Director of the Illinois State Board of Elections, in official capacity;

*members of the Illinois State Board of Elections official
and individual capacity*

Attorney General: Kwame Raoul

Assistance Attorney General Lee B. Stark

Kevin M. Morphew of Sorling Northrup Attorneys

*Same Email Addresses from the
7th Circuit Case*

All in their official and individual capacity

INTRODUCTION

Applicants respectfully request an **immediate administrative stay** enjoining the Illinois State Board of Elections from printing ballots for the March 17, 2026 primary election. Ballot printing is scheduled to occur within approximately **twenty-four (24) hours**, and once ballots are printed, Applicants' exclusion—and voters' loss of choice—will be **irreversible**.

Ballots for the March 17, 2026 primary election are scheduled to be printed within approximately twenty-four (24) hours. Once printed, Applicants' exclusion and voters' loss of choice cannot be remedied after the fact.

Applicants were blocked from the Objection Portal during the objection period, and the Board had actual notice. Physical injury occurred during official proceedings, and voters were intimidated from signing petitions. A brief stay preserves the status quo with minimal burden to the State while preventing irreversible constitutional harm.

MOTION FOR PRESERVATION OF EVIDENCE

Applicants respectfully request an order requiring Respondents to preserve all election-related records, including portal access logs, internal communications, ballot-printing instructions, and correspondence related to Applicants' candidacy, pending appeal. Preservation is necessary to prevent spoliation and ensure meaningful judicial review

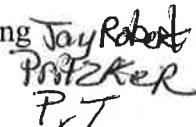
DECLARATION OF PATRICIA TILLMAN

I, Patricia Tillman, declare under penalty of perjury:

1. I was blocked from the Illinois State Board of Elections Objection Portal from November 3 through November 21, 2025 Friday end of business total lock out.
2. Legal Counsel admitted total lock out during Objection Window
3. Treated Different from other Candidates running for Governor and Lieutenant Governor
4. There are 6 Republican Candidates running for Governor, and the Illinois State Board Of Elections Blocked me from participating in the Election process in the attempt to have Governor Jay Pritzker to be the only Democratic Candidate on the Ballot running for Governor so that he would not have an opponent in the March 17, 2026 Primary Election
5. The Board's legal department and ethics officer confirmed I was blocked by Email. Email attached.
6. I was physically injured during an objection hearing and denied assistance.
7. Voters were intimidated from signing my petitions.
8. Ballots are scheduled to be printed within approximately 24 hours.

Executed on January 16, 2026.

Signature: 
Patricia Tillman


Jay Robert
Pritzker
P.T.

COVER PAGE

INTRODUCTION & JURISDICTION

Applicants respectfully request an **immediate administrative stay** enjoining the Illinois State Board of Elections from printing ballots for the March 17, 2026 primary election. Ballot printing is scheduled to occur within approximately **twenty-four (24) hours**, and once ballots are printed, Applicants' exclusion and voters' loss of choice will be **irreversible**.

This Court has jurisdiction under **28 U.S.C. § 1254**. Applicants sought emergency relief in the United States Court of Appeals for the Seventh Circuit. Relief was denied or not acted upon in time to prevent irreparable harm

STATEMENT OF FACTS

1. From November 3 through November 21, Applicant Patricia Tillman was **blocked from the Illinois State Board of Elections Objection Portal** and unable to participate.
2. Access was restored only **after business hours** and **after objection deadlines expired**.
3. The Board's legal department and ethics officer **confirmed by email** that Applicant was blocked.
4. Despite notice, the Board relied on missed deadlines caused by its own system failure to exclude Applicants from the ballot.
5. During an official objection hearing, opposing counsel **physically injured Applicant**, requiring medical treatment, while State officials refused assistance.
6. A known endorser of the incumbent Governor **seized nomination petitions from voters and intimidated them** from signing.
7. Ballots are scheduled to be printed within approximately **24 hours**.

ARGUMENT & RELIEF REQUESTED

Applicants are likely to succeed on the merits because their exclusion resulted from **state-created impossibility**, denial of procedural due process, and unconstitutional burden on ballot access.

Applicants will suffer **irreparable harm** once ballots are printed. The balance of equities favors a brief pause in printing, and the public interest favors voter choice and election integrity.

RELIEF REQUESTED:

Applicants respectfully request:

1. An **immediate administrative stay** preventing ballot printing;
2. An injunction pending appeal preserving Applicants' placement on the ballot; and
3. Such further relief as necessary to preserve this Court's jurisdiction.

STATEMENT OF IRREPARABLE HARM

STATEMENT OF IRREPARABLE HARM

This case presents classic, time-sensitive irreparable harm warranting immediate administrative relief.

Ballots for the March 17, 2026 Illinois primary election are scheduled to be printed within approximately twenty-four (24) hours. Once ballots are printed, Applicants' exclusion from the ballot—and voters' loss of choice—**cannot be remedied after the fact**, regardless of the merits of the appeal. Courts have repeatedly recognized that wrongful exclusion from the ballot constitutes irreparable injury because it permanently deprives candidates and voters of constitutional rights for that election cycle.

Here, the irreparable harm is compounded by **state-created impossibility**. Applicants were blocked from the Illinois State Board of Elections Objection Portal from November 3 through November 21, with access restored only after business hours and after objection deadlines had expired. The Board's own legal department and ethics officer confirmed by email that Applicant Patricia Tillman was blocked and unable to participate. Despite actual notice, the Board denied relief and later characterized Applicants as "incompetent," relying on missed deadlines caused by the State's own system failure.

Applicants also suffered **physical and coercive harm during official proceedings**. During an objection hearing, opposing counsel physically injured Applicant, requiring medical treatment and a brace, while State officials refused to summon medical or police assistance and instead threatened adverse ballot consequences if the hearing did not continue. Such coercion chilled participation in protected political activity and further obstructed Applicants' ability to defend ballot access.

Additionally, voters were irreparably harmed. A known endorser and circulator for the incumbent Governor physically interfered with petition circulation by seizing nomination papers from voters' hands and intimidating them into refusing to sign, as attested by a notarized voter affidavit and corroborating reports. Voter intimidation and suppression of political choice inflict irreparable harm not only on candidates, but on the electorate itself.

The Illinois State Board of Elections further aggravated harm by repeatedly placing Applicants on and removing them from the ballot, creating procedural confusion and then using that confusion to justify exclusion. This instability undermines election integrity and deprives voters of meaningful notice and choice.

By contrast, a brief administrative stay preventing ballot printing imposes **minimal burden on the State** and merely preserves the status quo while appellate review proceeds. The public interest strongly favors protecting constitutional rights, preventing outcome-determinative administrative error, and ensuring that elections reflect lawful voter choice rather than irreversible procedural exclusion.

For these reasons, immediate administrative relief is necessary to prevent irreparable harm that cannot be cured once ballots are printed.

Patricia L. Tillman 01-16-2026
Patricia L. Tillman 01-16-2026

STATEMENT OF IRREPARABLE HARM

Ballots for the March 17, 2026 primary election are scheduled to be printed within approximately twenty-four (24) hours. Once printed, Applicants' exclusion from the ballot—and voters' loss of choice—cannot be remedied after the fact. Courts uniformly recognize that wrongful ballot exclusion constitutes irreparable harm because the election passes without relief.

Applicants' exclusion resulted from **state-created impossibility**. From November 3 through November 21, Applicants were blocked from the Illinois State Board of Elections Objection Portal. Access was restored only after business hours and after objection deadlines expired. The Board's legal department and ethics officer confirmed by email that Applicant Patricia Tillman was blocked and unable to participate.

Despite actual notice, the Board relied on deadlines missed due to its own system failure to deny relief and exclude Applicants. During official objection proceedings, opposing counsel physically injured Applicant, requiring medical treatment, while State officials refused medical or police assistance and threatened adverse ballot consequences if proceedings did not continue.

**DECLARATION OF PATRICIA TILLMAN

IN SUPPORT OF EMERGENCY APPLICATION**

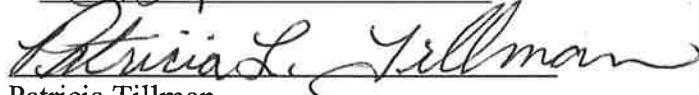
I, **Patricia Tillman**, declare as follows:

1. I am an Applicant in the accompanying Emergency Application for an Injunction Pending Appeal and for an Immediate Administrative Stay concerning the March 17, 2026 Illinois primary election.
2. I timely sought to defend my nomination papers through the Illinois State Board of Elections Objection Portal. From approximately **November 3 through November 21**, I was **blocked from accessing the Objection Portal** and was unable to participate or file responses.
3. I repeatedly notified the Illinois State Board of Elections that I lacked access to the Objection Portal. The Board's **legal department and ethics officer confirmed by email** that I was blocked and unable to participate.
4. My access to the Objection Portal was restored only **after business hours and after objection deadlines had expired**, rendering any access illusory and ineffective.
5. Despite having actual notice of the access failure, the Illinois State Board of Elections relied on missed deadlines caused by its own system failure to exclude me from the ballot.
6. During an official objection hearing, **opposing counsel physically injured my arm**, requiring medical treatment and the use of a brace. State election officials present **refused to provide medical or police assistance** and required the hearing to continue.
7. During the petition circulation period, a known endorser and circulator for the incumbent Governor **seized my nomination papers from voters' hands and intimidated voters** from signing, interfering with my campaign and voter choice.
8. The Illinois State Board of Elections **placed me on the ballot and removed me from the ballot multiple times**, creating confusion and then relying on that confusion to deny relief.
9. I am informed and believe that **ballots for the March 17, 2026 primary election are scheduled to be printed within approximately twenty-four (24) hours**.
10. Once ballots are printed without my name, my exclusion from the ballot and the voters' loss of choice **cannot be remedied**, even if I ultimately prevail on appeal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2026

at 5:30 pm


Patricia Tillman
L.

PROOF OF SERVICE

I certify that on January ___, 2026, I served the foregoing Emergency Application and all attachments by **email** upon:

- Illinois Attorney General: Kwame Raoul
- Assistant Attorneys General for the Illinois State Board of Elections: Lee B. Stark

Legal Counsel II and Ethics officer Illinois State Board elections: Sean Sarcu

Illinois State Board Of Election and Sitting Officers et, al

Kevin M. Morphew of Soring Northrup Attorneys
General Counsel

using the same email addresses listed on the Seventh Circuit docket.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: *Patricia L. Tillman*

01-16-2026

UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.8 (rev. 1.8.5)
Eastern Division

Patricia L Tillman

Plaintiff,

v.

Case No.: 1:26-cv-00218
Honorable Elaine E. Bucklo

Illinois State Board of Elections, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Tuesday, January 13, 2026:

MINUTE entry before the Honorable Elaine E. Bucklo: Motion hearing held on 1/13/2026. The motion for TRO is denied for the reasons stated on the record. A status hearing is set for 1/16/2026 at 1:00 p.m. in Courtroom 2243. Plaintiff shall ensure that Defendants have notice of the 1/16/26 hearing. The Clerk shall issue summons for service of the complaint on Defendants, and the Court directs the Marshal to serve summons. The Court advises Plaintiff that a completed USM-285 form is required for each named Defendant, and the U.S. Marshal will not attempt service on a Defendant unless and until the required form is received. Plaintiff must therefore complete and return a service form for the Defendant, and failure to do so may result in the dismissal of the unserved Defendant, as well as dismissal of this case in its entirety for lack of prosecution. 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.

Ex 1-

1 of 2

Activity in Case 1:26-cv-00218 Tillman v. Illinois State Board of Elections et al memorandum opinion and order

From: usdc_ecf_ilnd@ilnd.uscourts.gov (usdc_ecf_ilnd@ilnd.uscourts.gov)

To: ecfmail_ilnd@ilnd.uscourts.gov

Date: Friday, January 16, 2026 at 04:58 PM CST

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

NOTE TO PUBLIC ACCESS USERS There is no charge for viewing opinions.

United States District Court

Northern District of Illinois - CM/ECF NextGen 1.8 (rev. 1.8.5)

Notice of Electronic Filing

The following transaction was entered on 1/16/2026 at 4:58 PM CST and filed on 1/16/2026

Case Name: Tillman v. Illinois State Board of Elections et al

Case Number: 1:26-cv-00218

Filer:

WARNING: CASE CLOSED on 01/16/2026

Document Number: 14

Docket Text:

MEMORANDUM Opinion and Order: Plaintiff has not articulated a viable § 1983 claim against any of the defendants named in her complaint. Accordingly, the complaint is dismissed, and the TRO and preliminary injunction she seeks are denied. See attached Memorandum Opinion and Order for further details. Signed by the Honorable Elaine E. Bucklo on 1/16/2026. Mailed notice. (cp,)

1:26-cv-00218 Notice has been electronically mailed to:

Patricia L Tillman patriciatillman@rocketmail.com

1:26-cv-00218 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1040059490 [Date=1/16/2026] [FileNumber=30761829-0] [0cf3517abbc436f3139a6d84121fe470a957b39c997ad254df73a2e770e2bda5fd f4500759a94a963efde3b97043218569fdce46cd9aed66e422d72d4935c34f]]

2 of 2

UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

U.S.C.A. – 7th Circuit
R E C E I V E D
JAN 16 2026

Patricia L. Tillman and Joseph L. Mosley,
Candidates for Governor and Lieutenant Governor,
Plaintiffs–Appellants,

v.

Illinois State Board of Elections and its sitting officers, et al.;
Attorney General Kwame Raoul;
Assistant Attorney General Lee Stark;
Kevin M. Morphew and Sorling Northrup Attorneys;
Wallace Gator Bradley;
Sean Sarcu, Illinois State Board of Elections Legal Counsel II and Ethics Officer,
Defendants–Appellees.

District Court Case No.: 1:26-cv-00218
Appeal No.: (to be assigned)

**EMERGENCY MOTION FOR INJUNCTION PENDING
APPEAL**

AND FOR IMMEDIATE ADMINISTRATIVE STAY

Pursuant to Fed. R. App. P. 8(a)(2) and 28 U.S.C. § 1292(a)(1), Plaintiffs–Appellants respectfully move for an **immediate administrative stay and injunction pending appeal** prohibiting the printing of ballots scheduled for on or about **January 16, 2026**, pending expedited consideration of this motion.

I. JURISDICTION AND PROCEDURAL POSTURE

This Court has jurisdiction to review the district court’s denial of Plaintiffs’ motion for a temporary restraining order and preliminary injunction. Plaintiffs sought emergency relief in the **Northern District of Illinois**, which was **expressly denied**. No stay or injunction is in effect.

II. EMERGENCY NATURE OF RELIEF

Ex B

1-8

STATEMENT OF IRREPARABLE HARM

This case presents classic, time-sensitive irreparable harm warranting immediate administrative relief.

Ballots for the March 17, 2026 Illinois primary election are scheduled to be printed within approximately twenty-four (24) hours. Once ballots are printed, Applicants' exclusion from the ballot—and voters' loss of choice—**cannot be remedied after the fact**, regardless of the merits of the appeal. Courts have repeatedly recognized that wrongful exclusion from the ballot constitutes irreparable injury because it permanently deprives candidates and voters of constitutional rights for that election cycle.

Here, the irreparable harm is compounded by **state-created impossibility**. Applicants were blocked from the Illinois State Board of Elections Objection Portal from November 3 through November 21, with access restored only after business hours and after objection deadlines had expired. The Board's own legal department and ethics officer confirmed by email that Applicant Patricia Tillman was blocked and unable to participate. Despite actual notice, the Board denied relief and later characterized Applicants as "incompetent," relying on missed deadlines caused by the State's own system failure.

Applicants also suffered **physical and coercive harm during official proceedings**. During an objection hearing, opposing counsel physically injured Applicant, requiring medical treatment and a brace, while State officials refused to summon medical or police assistance and instead threatened adverse ballot consequences if the hearing did not continue. Such coercion chilled participation in protected political activity and further obstructed Applicants' ability to defend ballot access.

Additionally, voters were irreparably harmed. A known endorser and circulator for the incumbent Governor physically interfered with petition circulation by seizing nomination papers from voters' hands and intimidating them into refusing to sign, as attested by a notarized voter affidavit and corroborating reports. Voter intimidation and suppression of political choice inflict irreparable harm not only on candidates, but on the electorate itself.

The Illinois State Board of Elections further aggravated harm by repeatedly placing Applicants on and removing them from the ballot, creating procedural confusion and then using that confusion to justify exclusion. This instability undermines election integrity and deprives voters of meaningful notice and choice.

By contrast, a brief administrative stay preventing ballot printing imposes **minimal burden on the State** and merely preserves the status quo while appellate review proceeds. The public interest strongly favors protecting constitutional rights, preventing outcome-determinative administrative error, and ensuring that elections reflect lawful voter choice rather than irreversible procedural exclusion.

For these reasons, immediate administrative relief is necessary to prevent irreparable harm that cannot be cured once ballots are printed.

Ex A [Redacted]
Patricia L. Tillman 01-16-2026
2 of 8

Absent an immediate administrative stay, ballot printing scheduled for **January 16, 2026**, will irreversibly moot this appeal and deprive this Court and the Supreme Court of jurisdiction. No court can unprint ballots.

Emergency relief is therefore required to preserve appellate review.

Nken v. Holder, 556 U.S. 418 (2009); *Church of Scientology v. United States*, 506 U.S. 9 (1992).

III. STANDARD FOR INJUNCTION PENDING APPEAL

Under *Nken*, courts consider:

- (1) likelihood of success;
- (2) irreparable harm;
- (3) balance of equities; and
- (4) public interest.

IV. ARGUMENT

A. Likelihood of Success on the Merits

Plaintiffs raise substantial constitutional claims concerning ballot access, equal protection, and due process. Defendants altered their conduct during litigation by placing Plaintiffs on the ballot, while continuing to oppose judicial review. *Defendants blocked Plaintiff's access to Objection Portal During Objection window and admitted Illinois Board of Election's error*. Such conduct constitutes **voluntary cessation**, which does not moot a case absent assurance the *Attachment* conduct will not recur.

City of Mesquite v. Aladdin's Castle, 455 U.S. 283 (1982).

SEE EX. A. Statement of IRREPARABLE HARM
Absent injunctive relief, Defendants remain free to reverse course again.

B. Irreparable Harm: Mootness

Once ballots are printed, relief becomes impossible and appellate jurisdiction is destroyed.

Church of Scientology, 506 U.S. at 12–13;

Southern Pacific Terminal Co. v. ICC, 219 U.S. 498 (1911).

This harm is immediate and irreparable.

C. Balance of Equities

Plaintiffs seek only a temporary pause in printing. The State faces minimal burden, while Plaintiffs face permanent constitutional injury absent relief.

D. Public Interest

The public interest favors lawful elections, equal application of election laws, and preservation of judicial review.

FTC v. Dean Foods Co., 384 U.S. 597 (1966).

V. AUTHORITY FOR ADMINISTRATIVE STAY

This Court has authority to issue an administrative stay under:

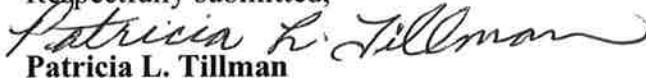
- **All Writs Act**, 28 U.S.C. § 1651(a)
- *FTC v. Dean Foods Co.*, 384 U.S. 597 (1966)

VI. RELIEF REQUESTED

Plaintiffs respectfully request that this Court:

1. Issue an **immediate administrative stay** prohibiting ballot printing;
2. Grant an **injunction pending appeal**;
3. **Expedite consideration** of this motion; and
4. Grant such other relief as justice requires.

Respectfully submitted,


Patricia L. Tillman

Plaintiffs-Appellants, Pro Se
229 e. 51st Chicago IL. 60615
312-316-1305
patriciatillman@rocketmail.com

DECLARATION

DECLARATION OF Patricia L. Tillman

I, Patricia L. Tillman, declare under penalty of perjury:

1. I am a Plaintiff-Appellant in this matter.
2. I am informed and believe that ballots are scheduled to be printed on or about **January 16, 2026**.
3. The United States District Court for the Northern District of Illinois denied Plaintiffs' motion for a temporary restraining order and preliminary injunction.
4. No stay or injunction is currently in effect.
5. If ballots are printed, Plaintiffs' appeal will be irreversibly mooted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 14, 2026.

Patricia L. Tillman
Patricia L. Tillman
01-16-2026

MOTION TO EXPEDITE

MOTION TO EXPEDITE CONSIDERATION

Plaintiffs–Appellants respectfully move to expedite consideration of their **Emergency Motion for Injunction Pending Appeal and for Immediate Administrative Stay**.

Ballot printing is scheduled to occur on or about **January 16, 2026**. Absent expedited review, Plaintiffs' appeal will be rendered moot before the Court can act.

Expedited consideration is necessary to preserve jurisdiction and prevent irreparable harm.

Respectfully submitted,

Patricia L. Tillman
Patricia L. Tillman

Plaintiffs–Appellants, Pro Se

Patricia L. Tillman 01-16-2026

RECEIVED

JAN 16 2026

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

ATRICIA L. TILLMAN AND
JOSEPH L. MOSLEY
Plaintiff
ILLINOIS STATE BOARD, et al.
Defendant

)
Case Number: 1-26-CV-00218

)
Judge: Elaine E. BUCKIO

)
Magistrate Judge:

EMERGENCY NOTICE OF APPEAL

Emergency Motion for Injunction Pending Appeal
And for Immediate Administrative Stay

Patricia L. Tillman
01-16-2026

RECEIVED

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

11 16 2026

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Patricia L. Tillman)
Joseph L. Mosley)
Plaintiff)
v.)
Notice of Emergency)
Defendant)

Case Number: 1-26-CV-~~00218~~

Judge: Elaine E BUCKLO

Magistrate Judge:

Illinois State Board of Elections and sitting officers et al
Attorney General KADAME RAOUF APPEAL
Assistant Attorney General Lee STARK
Kevin M. MORPHEW and Sean GATOR BRADLEY
Wallace SARCUS and SOZLING NORTHRUP Attorney
Legal Counsel II Illinois State Board of
Emergency motion for injunction OFFICER
Pending APPEAL And for immediate
Administrative stay

Patricia L. Tillman

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

8 of 8

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

BEFORE THE STATE BOARD OF ELECTIONS SITTING AS THE STATE OFFICERS
ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OF OBJECTIONS
TO NOMINATION PAPERS OF CANDIDATES FOR THE MARCH 17, 2026,
GENERAL PRIMARY

DECISION

The State Board of Elections, sitting as the duly constituted State Officers Electoral Board, and having convened on December 9, 2025, at 69 W. Washington, Chicago, Illinois, and via videoconference at 2329 S. MacArthur Blvd., Springfield, Illinois and having heard and considered the objections filed in the above-titled matter, hereby determines and finds that:

1. The State Board of Elections has been duly and legally constituted as the State Officers Electoral Board pursuant to Sections 10-9 and 10-10 of the Election Code (10 ILCS 5/10-9 and 5/10-10) for the purpose of hearing and passing upon the objections filed in this matter and as such, has jurisdiction in this matter.
2. On November 10, 2025, Tanya D. Anderson timely filed an objection to the nomination papers of Patricia L. Tillman and Joseph L. Mosley, Democratic Party candidates for the office of Governor and Lieutenant Governor.
3. A call for the hearing on said objection was duly issued and was served upon the Members of the Board, the Objector, and the Candidates by registered mail as provided by statute unless waived.
4. On November 18, 2025, the State Officers Electoral Board voted to adopt the Rules of Procedure, and a hearing officer was assigned to consider arguments and evidence in this matter.

5. Rule of Procedure 1(a) provides, in relevant part; “On all hearing dates set by the Board or its designated Hearing Officer (other than the Initial Meeting), the objector and the candidate shall be prepared to proceed with the hearing of their case. Due to statutory time constraints, the Board must proceed as expeditiously as possible to resolve the objections. Therefore, there will be no continuances or resetting of the Initial Meeting or future hearings except for good cause shown.”
6. Rule of Procedure 1(c) provides: “Though every effort will be made by the Board and its designated Hearing Officers to keep parties informed of upcoming events by providing actual notice, parties shall be responsible for periodically checking the Board’s website to keep fully apprised of scheduled events in their case. The posting of events to the Board’s website shall serve as constructive notice to the parties of the posted schedule. The failure of a party to receive actual notice of an event regarding their case shall not prevent such event from proceeding as scheduled, nor shall it invalidate any action taken at such event, as long as the party had constructive notice of the event from a posting on the Board’s website.”
7. Rule of Procedure 5(c) provides: “Removal or Reassignment of Hearing Officers. A Hearing Officer may be removed or reassigned from a case by the General Counsel for: (1) administrative reasons; or (2) at the request of a party for good cause shown.”
8. Rule of Procedure 6 provides, in relevant part: “All motions, briefs, notices, documents, pleadings, answers, and correspondence are to be filed and served upon all parties by uploading to the Petition and Objection Portal.”
9. Rule of Procedure 9(b) provides, in relevant part: “At the direction of the Board or a Hearing Officer, the parties may appear at a records examination. Notice of same shall be provided by the Board or the Hearing Officer.”
10. On November 18, 2025, an initial case management conference was held with Objector Anderson appearing through counsel, Candidate Tillman appearing *pro se*, and the Hearing Officer appearing via telephone conference.
11. On November 18, 2025, the Hearing Officer’s Initial Case Management Order was uploaded to this case in the Petition and Objection Portal. The Order included notice of a record examination to be conducted at 9:00 AM on November 24, 2025, at the Springfield office of the State Board of Elections.

12. On November 18, 2025, Objector filed a Standing Objection per Rule 9 of the Rules of Procedure. Candidates did not file a Standing Objection form.
13. On November 19, 2025, a Record Exam Schedule was uploaded to this case in the Petition and Objection Portal. The record exam for this case was included in that schedule.
14. On November 19, 2025, a Record Exam Schedule was posted to the Illinois State Board of Elections website. The record exam for this case was included in that schedule.
15. On November 22, 2025, a Notice of Record Exam was uploaded to this case in the Petition and Objection Portal.
16. On November 24, 2025, at 9:00 AM, a record examination was conducted by the staff of the State Board of Elections. Candidates collected a total of 7,253 signatures. There were 3,767 line objections reviewed by State Board of Elections staff. Of those lines reviewed, 2,949 of the objections were sustained, and 818 were overruled. At the conclusion of the records examination, Candidates had 4,304 valid signatures, which is 696 under the statutory minimum of 5,000 signatures per Section 7-10(a) of the Election Code.
17. Neither party had watchers present for the conduct of the record examination.
18. On November 24, 2025, at 9:29 AM, Candidate Tillman emailed an unsigned extension affidavit requesting a 45-day continuance of the record exam and all associated deadlines.
19. On November 24, 2025, Candidate Tillman filed a Motion for Continuance for Record Exam/Extension to the Petition and Objection Portal at 1:10 PM, which also requested a change of hearing officer. Candidate Tillman filed an unsigned affidavit at 1:20 PM.
20. Under Rule 5(c) of the Rules of Procedure, on November 25, 2025, Candidate Tillman's request for a change of Hearing Officer was granted by the General Counsel, and this matter was re-assigned to Hearing Officer Michael Tecson.

21. On November 25, 2025, an Objection Detail Record and Objection Summary Report summarizing the results of the record examination was posted to the Petition and Objection Portal.
22. On December 2, 2025, Candidate Tillman filed a "Motion to Disqualify Kevin M. Morphew, Sorling Northrup Attorneys for Miss Conduct Rule 8.4 and Ethical Misconduct, and Extension of Record Exam, and All Proceedings Before the Illinois State Board of Elections And Anyone Sitting as the Officers Electoral Board" requesting the Board grant an extension of at least 45 days of the conduct of the record examination and all proceedings, also moving to disqualify Objector's counsel, and requesting that professional disciplinary actions be taken against Objector's counsel and former Hearing Officer Herman.
23. On December 3, 2025, the Board's appointed Hearing Officer Michael Tecson issued a recommended decision in this matter after reviewing all matters in the record, including arguments and/or evidence tendered by the parties.
24. Upon consideration of this matter, the Board adopts the findings of fact, conclusions of law, and recommendations of the Hearing Officer and the General Counsel and finds that:
 - A. Candidate Tillman was given ample notice of the November 24, 2025, record examination under Rules of Procedure 1(c), 6, and 9(b).
 - B. Candidate Tillman's Motion for Continuance for Record Exam/Extension was untimely filed on November 24, 2025, because it was not filed until after the record exam commenced. Accordingly, the motion is denied under Rule 1(a) of the Rules of Procedure.
 - C. Candidate Tillman's request for an extension of time for the record examination and a continuance of proceedings for at least 45 days requested in her Motion to Disqualify Kevin M. Morphew, Sorling Northrup Attorneys for Miss Conduct Rule 8.4 and Ethical Misconduct, and Extension of Record Exam, and All Proceedings Before the Illinois State Board of Elections And Anyone Sitting as the Officers Electoral Board filed on December 2, 2025, is denied under Rule 1(a) of the Rules of Procedure. The Board lacks the authority to grant the other relief requested against Objector's counsel and the former Hearing Officer assigned to this matter, and those requests are dismissed.

- D. Following the conduct of the November 24, 2025, record examination, Candidates have filed 4,304 valid signatures within their nominating petitions, which is 696 fewer than the 5,000 signatures statutorily required by Section 7-10(a) of the Election Code.
- E. The remaining pagination and notarial objections raised in Objector's objection petition have been rendered moot by the findings of Paragraph 24(D) above, as the Candidates do not qualify for ballot access due to insufficient signatures.

IT IS HEREBY ORDERED that Candidate Tillman's Motion for Continuance for Record Exam/Extension is DENIED, Candidate Tillman's Motion to Disqualify Kevin M. Morphew, Sorling Northrup Attorneys for Miss Conduct Rule 8.4 and Ethical Misconduct, and Extension of Record Exam, and All Proceedings Before the Illinois State Board of Elections And Anyone Sitting as the Officers Electoral Board is DENIED in part and DISMISSED in part, and the objection of Tanya D. Anderson to the nomination papers of Patricia L. Tillman and Joseph L. Mosley, Democratic Party candidates for nomination to the offices of Governor and Lieutenant Governor, is SUSTAINED based on the findings contained in Paragraph 24 above, and the names of the Candidates Patricia L. Tillman and Joseph L. Mosley SHALL NOT be certified for the March 17, 2026, General Primary Election ballot.

DATED: 12/09/2025



Laura K. Donahue
Laura K. Donahue, Chair

Note Regarding Candidate Tillman's Ability to File Documents in the Petition and Objection Portal

From: Sarcu, Sean (ssarcu@elections.il.gov)

To: dherman@gwcblaw.com; kmmorphew@sorlinglaw.com; patriciatillman@rocketmail.com

Cc: GeneralCounsel@elections.il.gov

Date: Friday, November 21, 2025 at 04:16 PM CST

Hi Dave and all parties,

I am sending this along to note that Candidate Tillman's inability to file documents through the Petition and Objection Portal has been solved as of about 4:05PM. I can confirm that up until this point, she was unable to upload documents to the portal due to a coding error in our system that we have encountered in other cases. You may notice that Candidate Tillman is now listed as an attorney (representing herself) in this case—that is the short-term fix we have discovered that solves this issue until the larger coding problem is solved.

As a result, Candidate Tillman is able to file documents as of 4:05PM today. It is true that the portal would not allow her to prior to that point in time.

Best,

Sean Sarcu (he/him)
Legal Counsel II and Ethics Officer
Illinois State Board of Elections
(312) 814-6452

Ex E

Glenetta Bell
12411 State St.
Chicago, IL 60628

December 17, 2025

To whom it may Concern.

my name is Glenetta. On 9-3-25

I was camping with my dear
Friend Patricia L. Tillman at Vision
Theatre and Events. Located at 11901

S. Loomis St. Chicago IL 60643

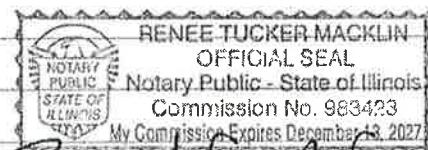
We were standing in side door of
the entrance area. Circulating nominations
petitions for Patricia L. Tillman.

When Gator Bradley walked up and
aggressively stated w/ J. B. Pritzker petitions
in his hand. "Don't sign that petition.
Fuck that Bitch. We're signing J. B's
petitions. We're getting high on the
Ballot. He continued to do this
thru out the night w/ multiple
voters. Stopping them from signing
Patricia L. Tillman's petitions

Sincerely,

Glenetta Bell

Patricia L. Tillman



12/19/2025

Ex F

BEFORE THE STATE BOARD OF ELECTIONS SITTING AS THE STATE OFFICERS
ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OF OBJECTIONS
TO NOMINATION PAPERS OF CANDIDATES FOR THE MARCH 17, 2026,
GENERAL PRIMARY

IN THE MATTER OF OBJECTIONS BY)

Tanya D. Anderson,)

Objector,)

v.)

No. 25 SOEB GP 554

Patricia L. Tillman and Joseph L. Mosley,)

Candidates.)

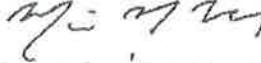
ORDER ON MOTION TO CHANGE HEARING OFFICER

Pursuant to Rule of Procedure 5(c) of the Illinois State Officers Electoral Board adopted November 18, 2025, in the above-titled matter, the General Counsel determines and finds that:

1. On November 24, 2025, Candidate Tillman filed a motion requesting a change of hearing officer from Hearing Officer Dave Herman in this matter.
2. Rule 5(c) authorizes the General Counsel to remove or reassign Hearing Officers for administrative reasons or at the request of a party for good cause shown.
3. Candidate Tillman's motion alleges she felt intimidated by Hearing Officer Herman at the November 18, 2025, initial status hearing.
4. Although the General Counsel has observed no unfairness in the Hearing Officer's handling of this proceeding, after consideration of this matter, the General Counsel finds that Candidate Tillman has shown good cause for a change of hearing officer.

IT IS HEREBY ORDERED that Candidate's motion for a change of hearing officer is GRANTED, and Michael Tecson is appointed as Hearing Officer for further proceedings in this matter.

DATED: 11/25/2025



Marni M. Malowitz
General Counsel

Exhibit 

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