

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

| | |
|---|---|
| <p>STATE OF ILLINOIS; STATE OF CALIFORNIA; STATE OF COLORADO; and STATE OF MINNESOTA,</p> <p>Plaintiffs,</p> <p>v.</p> <p>RUSSELL VOUGHT, <i>in his official capacity as Director of the Office of Management & Budget, et al.</i>;</p> <p>Defendants.</p> | <p>Case No. 26-cv-01566</p> <p>Honorable Judge Manish S. Shah</p> |
| <p>AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, AFL-CIO <i>et al.</i>,</p> <p>Plaintiffs,</p> <p>v.</p> <p>RUSSELL VOUGHT, <i>in his official capacity as Director of the Office of Management & Budget, et al.</i>;</p> <p>Defendants.</p> | <p>Case No. 26-cv-02656</p> <p>Honorable Judge John F. Kness</p> |

**PLAINTIFFS' NOTICE OF MOTION FOR REASSIGNMENT BASED ON
RELATEDNESS**

PLEASE TAKE NOTICE that, on March 17, 2026 at 9:45 a.m., or as soon thereafter as counsel may be heard, Plaintiffs' Motion for Reassignment based on Relatedness will be presented to Judge Manish S. Shah, or any other judge sitting in their stead, in Room 1919 of the Everett McKinley Dirksen United States Courthouse located at 219 South Dearborn Street, Chicago, Illinois 60604.

Dated: March 10, 2026

/s/ Joel McElvain

Joel McElvain (DC Bar No. 448431)
Shiva Kooragayala (IL Bar No. 6336195)
Kristen Miller (DC Bar No. 229627)*
Cortney Robinson Henderson (DC Bar No.
1656074)*
Yenisey Rodríguez (DC Bar No. 1600574)*
DEMOCRACY FORWARD FOUNDATION
P.O. Box 34553
Washington, DC 20043
(202) 297-4810
jmcelvain@democracyforward.org
skooragayala@democracyforward.org
crhenderson@democracyforward.org
consultantkmiller@democracyforward.org
yenisey.rodriguez@democracyforward.org

Matthew Blumin (DC Bar No. 1007008)*
Georgina Yeomans (DC Bar No. 1510777)*
AMERICAN FEDERATION OF STATE,
COUNTY, AND MUNICIPAL
EMPLOYEES, AFL-CIO (AFSCME)
1625 L Street NW
Washington, DC 20036
(202) 775-5900
MBlumin@afscme.org
GYeomans@afscme.org

** Motions for pro hac vice pending or forthcoming*

Counsel for All Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2026, I caused a copy of the foregoing Motion to be sent to Defendants' counsel at the U.S. Department of Justice in *Illinois v. Vought*, 1: 26-cv-1566 by electronic mail:

Michael Velchik, Michael.Velchik@usdoj.gov

Patrick Johnson, Patrick.Johnson2@usdoj.gov

/s/ Shiva Kooragayala
Shiva Kooragayala