

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

JANE DOE,)	
)	
Plaintiff,)	Case No. 1:11-cv-01119
)	
v.)	Judge Ronald A. Guzman
)	
BEVERLY SANDLER,)	Magistrate Judge Sidney I. Schenkier
)	
Defendant.)	

**PLAINTIFF’S MOTION FOR ENTRY OF
CONSENT DECREE OR, ALTERNATIVELY, FOR
EXTENSION OF TEMPORARY RESTRAINING
ORDER AND FOR PRELIMINARY INJUNCTION**

Plaintiff, Jane Doe (“Plaintiff”), by her attorneys, hereby moves the Court for entry of a consent decree resolving this matter or, alternatively, for an extension of the temporary restraining order entered against defendant, Beverly Sandler (“Defendant”) on February 17, 2011 (“the TRO”) and for entry of a preliminary injunction. In support of this motion, Plaintiff states as follows:

1. Defendant was personally served with the TRO on February 17, 2001, along with a copy of the Complaint, Motion for Temporary Restraining Order, and supporting memorandum. On February 18, 2011, Defendant was personally served with summons and another copy of the Complaint.

2. On February 21, 2011, Defendant contacted Plaintiff’s counsel. Defendant stated that she was not represented by counsel and that she wanted to resolve the issues raised in this lawsuit. The parties thereafter negotiated a settlement of the lawsuit.

3. The settlement is contingent upon entry by the Court of a Consent Decree substantially in the form of Exhibit A. (Plaintiff's true name has been redacted from the proposed consent decree. Plaintiff's counsel will provide an unredacted version of the Consent Decree to the Court.)

4. Accordingly, Plaintiff, with the agreement of Defendant, requests that the Court enter the Consent Decree.

5. Alternatively, if the Court declines to enter the Consent Decree in substantially the form proposed by the parties, Plaintiff asks that the TRO be extended for an additional fourteen days and hereby moves for entry of a preliminary injunction against Defendant for the reasons set forth in Plaintiff's Motion for Temporary Restraining Order. By its terms, the TRO will expire on Sunday, February 27, 2011 at 5:30 p.m. If the Court declines to enter the Consent Decree, Plaintiff requests that the TRO be extended for a period of fourteen days for good cause (*i.e.*, so that the parties can further explore settlement) and that the matter be set for evidentiary hearing on Plaintiff's motion for preliminary injunction.

WHEREFORE, plaintiff, Jane Doe, requests that the Court: (1) enter an unredacted version of the attached Consent Decree and order that it be filed under seal; or alternatively (2) extend the Temporary Restraining Order previously entered in this matter until March 11, 2011 and schedule this matter for hearing on Plaintiff's motion for preliminary injunction.

Respectfully submitted,

/s/ Marshall L. Blankenship
One of the attorneys for plaintiff, Jane Doe

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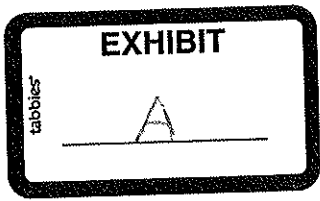
JANE DOE,)	
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Plaintiff,)	Case No. 1:11-cv-01119
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CONSENT DECREE

WHEREAS, Plaintiff has commenced this action by filing the complaint herein; Defendant has been served with summons and complaint; and the parties have agreed to settlement of this action contingent upon the entry of a consent decree containing the following terms and conditions,

THEREFORE, on the joint motion of Plaintiff and Defendant, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

1. This Court has jurisdiction of the subject matter and of the parties.
2. The Complaint states a claim upon which relief may be granted against Defendant.
3. The Defendant is permanently enjoined from distributing or causing to be distributed any photographs, video or electronic images of [REDACTED]. The Defendant is ordered to destroy all photographs, video or electronic images of [REDACTED] in Defendant's possession, custody or control.
4. The Defendant is permanently enjoined from communicating or causing to be communicated any statements concerning [REDACTED] relating to [REDACTED]'s personal or sexual relationships (other than with Defendant's counsel).
5. The Defendant is enjoined from attempting, initiating or making contact with



[REDACTED] her family, or her acquaintances.

6. This Consent Decree is to be filed under seal.

7. The Defendant is ordered to not disclose the contents of this Consent Decree to anyone other than her attorney.

8. This Court shall retain jurisdiction of this matter for the purposes of enabling any of the parties to this Consent Decree to apply to the Court at any time for such further orders or directives as may be necessary or appropriate for the interpretation or modification of this Consent Decree, for the enforcement of compliance therewith, or for the punishment of violations thereof.

JUDGMENT IS THEREFORE ENTERED in favor of the plaintiff and against the defendant, pursuant to all the terms and conditions recited above.

Dated: February __, 2011

Agreed to by:

[Handwritten Signature]
One of the attorneys for plaintiff, [REDACTED]

Beverly Sandler
BEVERLY SANDLER

ENTERED:

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for plaintiff, certifies that on February 23, 2011 he caused a copy of the foregoing Notice of Motion and Plaintiff's Motion for Entry of Consent Decree or, Alternatively, for Extension of Temporary Restraining Order and for Preliminary Injunction, to be served by e-mail and U.S. Mail, postage prepaid, on:

Beverly Sandler
2335 Robertson Lane
Flossmoor, IL 60422
bevshoes@yahoo.com

/s/ Marshall L. Blankenship