

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

CHICAGO HEADLINE CLUB <i>et al.</i>	)	
	)	
Plaintiffs,	)	No. 25-cv-12173
	)	
v.	)	The Hon. Sara L. Ellis
	)	United States District Judge
KRISTI NOEM, Secretary of U.S.	)	
Department of Homeland Security, in her	)	
official capacity, <i>et al.</i> ,	)	
	)	
Defendants.	)	

PLAINTIFFS' MOTION TO DISMISS

Plaintiffs respectfully move this Court to dismiss this case with prejudice pursuant to Rule 23 and Rule 41. In support, Plaintiffs state:

1. As the Court is aware, this case has involved extensive, time-consuming litigation in a compressed time period.
2. Recently, however, the situation that precipitated the relief sought in this litigation has changed in a material way. Specifically, it appears that Operation Midway Blitz, has ended. The roughly 200-225 DHS agents led by Defendant Bovino who traveled from Los Angeles to the Chicagoland area are no longer operating in the Northern District of Illinois.
3. Moreover, since Defendant Bovino and his agents left the Northern District, Plaintiffs' counsel has not received a single report of unconstitutional behavior that necessitated this case since November 8, 2025.
4. All individual plaintiffs – the Class Representatives and the other individual named plaintiffs – agree to dismissal with prejudice.

5. Defendants have agreed that they consent to Plaintiffs' forthcoming motion to move to stay the pending appeal while this Court considers the motion to dismiss. Defendants have indicated that they will move to dismiss the appeal if this Court dismisses the case with prejudice, and Plaintiffs have indicated that they will consent to that motion when it is filed.

6. Class Counsel agree that a dismissal with prejudice at this stage is fair and reasonable. With the Defendants no longer participating in Operation Midway Blitz, or other similar conduct under any moniker or other mission title in this District, this case is no longer needed to protect Class Members' interests.

7. Therefore, Plaintiffs respectfully request that the Court dismiss the case with prejudice after holding the type of hearing required by Federal Rule of Civil Procedure 23(e).

8. Plaintiffs respectfully request a status conference to discuss the logistics of the required hearing under Rule 23(e).

Respectfully submitted,

/s/Steve Art

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