

**IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS**

CATHOLIC CHARITIES OF THE)
DIOCESE OF SPRINGFIELD-IN-ILLINOIS,)
an Illinois non-profit corporation,)
CATHOLIC CHARITIES OF THE)
DIOCESE OF PEORIA, an Illinois non-profit)
corporation, CATHOLIC CHARITIES OF)
THE DIOCESE OF JOLIET, INC., an Illinois)
non-profit corporation, and CATHOLIC)
SOCIAL SERVICES OF SOUTHERN)
ILLINOIS, DIOCESE OF BELLEVILLE, an)
Illinois non-profit corporation,)

Plaintiffs,)

v.)

STATE OF ILLINOIS, LISA MADIGAN, in)
her official capacity as the Attorney General)
of the State of Illinois, ERWIN McEWEN, in)
his official capacity as Director of the)
Department of Children and Family Services,)
State of Illinois, and the DEPARTMENT OF)
CHILDREN AND FAMILY SERVICES,)
State of Illinois, ROCCO J. CLAPPS in his)
official capacity as Director of the)
Department of Human Rights, State of)
Illinois, and the DEAPRTMENT OF)
HUMAN RIGHTS, State of Illinois,)

Defendants, and)

SUSAN TONE PIERCE, as Next Friend and)
on behalf of a certified class of all current and)
future foster children in custody of DCFS in a)
federal case titled *B.H. v. McEwen*, No. 88 cv)
5589 (N.D. Ill. 1988); SARAH RIDDLE and)
KATHERINE WESEMAN,)

Proposed Intervening Defendants.)

Case No. 11-MR-254

Hon. John Schmidt
Presiding Judge

TO: See attached service list.

NOTICE OF MOTION AND HEARING

Please take notice that on August 1, 2011 at 11:00 a.m., or as soon thereafter as counsel may be heard on the Court's regular motion call, the undersigned counsel for putative intervenors, Susan Tone Pierce and Katherine Weseman and Sarah Riddle, will appear before the Hon. John Schmidt, in the courtroom usually occupied by him, or wherever else he may be sitting, or before any Judge there sitting in his stead, and then and there will present the following:

1. Motion to Intervene by Intervenors Susan Tone Pierce and Katherine Weseman and Sarah Riddle and Memorandum of Law in Support thereof; and
2. Motion by Intervenors Susan Tone Pierce and Katherine Weseman and Sarah Riddle in Support of Defendants' Motion for Summary Judgment and Memorandum of Law in Support thereof.

Copies of said papers are served upon you herewith.

Date: July 29, 2011

One of Intervenors' attorneys

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CERTIFICATE OF SERVICE

Donald M. Craven hereby certifies that on July 29, 2011, he caused true and correct copies of the following papers: (1) Notice of Motion; (2) Motion to Intervene and Memorandum of Law in Support thereof; and (3) Motion by Intervenor-Defendants in Support of Defendants' Motion for Summary Judgment and Memorandum of Law in Support thereof, to be served by First Class Mail, postage prepaid, on the following persons:

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