

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

CHICAGO HEADLINE CLUB, et al.,

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity, et
al.

Defendants

No. 25-cv-12173

Honorable Sara L. Ellis,
District Judge

**PLAINTIFFS' NOTICE OF AMENDED
PROPOSED TEMPORARY RESTRAINING ORDER**

Pursuant to this Court's orders and guidance at the hearing held on October 6, 2025 in this matter, Plaintiffs submit the attached amended proposed temporary restraining Order, which Plaintiffs ask this Court to enter for all of the reasons explained in their Complaint, Dkt. 1, Motion for Temporary Restraining Order, Dkt. 21, and during the hearing on October 6. In further support of this amended proposed temporary restraining, Plaintiffs state:

1. Plaintiffs' amended proposed TRO is attached to this filing as Exhibit A. A redline version comparing the amended proposed TRO to the version filed with the Court on October 6 is attached to this filing as Exhibit B.
2. Plaintiffs' amended proposed TRO adopts all changes ordered by this Court at the October 6 hearing. Those changes are reflected in paragraphs 1(a), 1(g) 1(h), 1(j), and 1(k).
3. As ordered by this Court, the parties conferred in the morning of October 8, 2025. Plaintiffs' counsel explained Plaintiff's proposed changes to the TRO, the parties attempted to reach agreement on the scope of paragraphs 1(b) and (2), and Defendants' counsel stated that

they had numerous additional changes and would submit their proposed changes to the Court in a filing.

RESPECTFULLY SUBMITTED,

/s/ Steve Art

One of Plaintiffs' Attorneys

Jon Loevy
Locke Bowman
Steve Art
Heather Lewis Donnell
Theresa Kleinhaus
Matt Topic
Lindsay Hagy
Jordan Poole
Dominique Gilbert
Justin Hill
Aaron Tucek
Alexandra Wolfson
LOEVY + LOEVY
311 N. Aberdeen Street
Chicago, Illinois 60647
(312) 243-5900
steve@loevy.com

Elizabeth Wang
Isaac Green
LOEVY + LOEVY
2060 Broadway, Ste. 460
Boulder, CO 80302

David B. Owens
LOEVY + LOEVY
% Civil Rights and Justice Clinic
University of Washington Law School
William H. Gates Hall, Suite 265
Seattle, WA 98145-1110

Craig B. Futterman
MANDEL LEGAL AID CLINIC
University of Chicago Law School
6020 S. University
Chicago, IL 60637
(773) 702-9611
futterman@uchicago.edu

Hayden Johnson*
Katie Schwartzmann*
Conor Gaffney*
PROTECT DEMOCRACY PROJECT
2020 Pennsylvania Ave NW, Ste 601
Washington DC 20006
(202) 579-4582
hayden.johnson@protectdemocracy.org
katie.schwartzmann@protectdemocracy.org
conor.gaffney@protectdemocracy.org
* *Application for pro hac vice forthcoming*

Daniel Massoglia
Hannah C. Marion
FIRST DEFENSE LEGAL AID
601 S. California Ave.
Chicago, IL 60612
(336) 575-6968
daniel@first-defense.org
hannah@first-defense.org

Wallace Hilke
**COMMUNITY JUSTICE AND CIVIL
RIGHTS CLINIC**
Bluhm Legal Clinic, Northwestern Pritzker
School of Law
375 E. Chicago Ave.
Chicago, IL 60611
(312) 503-2224
wally.hilke@law.northwestern.edu

Kevin M. Fee, Jr.
Rebecca Glenberg
**ROGER BALDWIN FOUNDATION OF
ACLU, INC.**
150 N. Michigan, Suite 600
Chicago, IL 60601
(312) 201-9740
kfee@aclu-il.org
rglenberg@aclu-il.org