## APPEAL TO THE APPELLATE COURT OF ILLINOIS FIRST JUDICIAL DISTRICT FROM THE CIRCUIT COURT OF COOK! 50 WINTY FILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

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ILLINOIS COLLABORATION ON YOUTH,	)	OUTTER B	RO.
ACCESS LIVING OF METROPOLITAN CHICAGO,	)		
ADDUS HEALTHCARE INC., AIDS FOUNDATION	)		
OF CHICAGO, CARITAS FAMILY SOLUTIONS,	)		
CENTER FOR HOUSING AND HEALTH,	)		
CENTER FOR YOUTH AND FAMILY SOLUTIONS,	)		
CHICAGO COMMONS, CHILDREN'S HOME + AID,	)		
CONNECTIONS FOR THE HOMELESS,	)		
DUPAGE YOUTH SERVICES COALITION,	)		
FAMILY ALLIANCE, INC. FAMILY FOCUS,	)		
FOX VALLEY OLDER ADULT SERVICES,	)		
HAVEN YOUTH AND FAMILY SERVICES,	<i>)</i>		
HEARTLAND HUMAN CARE SERVICES,	)		
HOUSING OPPORTUNITIES FOR WOMEN, ILLINOIS	)		
COALITION AGAINST SEXUAL ASSAULT,	)		
INTERFAITH HOUSING DEVELOPMENT	)		
CORPORATION, INSPIRATION CORP.	)		
Jewish Child and Family Services, Jewish	)		
VOCATIONAL SERVICE AND EMPLOYMENT	)		
CENTER, KEMMERER VILLAGE, LESSIE	)		
BATES DAVIS NEIGHBORHOOD HOUSE,	)	1.0	CII (170
LUTHERAN CHILD AND FAMILY SERVICES,	)	16	-CH-6172
MEDICAL GEAR, LLC, NEW AGE ELDER CARE,	)		
NEW MOMS, METROPOLITAN FAMILY SERVICES,	)		
OMNI Youth Services, One Hope United,	)		
POLISH AMERICAN ASSOCIATION, PROJECT OZ,	)		
PUERTO RICAN CULTURAL CENTER,	)		
SHELTER, INC., STEPHENSON COUNTY HEALTH	)		
DEPARTMENT, STEPPING STONES OF ROCKFORD,	)		
INC., THE BABY FOLD, THE FELLOWSHIP HOUSE,	)		
THE NIGHT MINISTRY, OUNCE OF PREVENTION,	)		
TREATMENT ALTERNATIVES FOR SAFE	)		
Communities., Universal Family	)		
Connection, Union County, Unity	)		
Parenting, Western Illinois Managed	)		
HOME SERVICES, WHITESIDE COUNTY HEALTH	)		
DEPARTMENT, YOUTH OUTREACH SERVICES,	)		
	)		
Plaintiffs,	)		
V.	)		

JAMES DIMAS, SECRETARY OF THE ILLINOIS DEPARTMENT OF HUMAN SERVICES, in his official capacity, JEAN BOHNHOFF, ACTING DIRECTOR OF THE ILLINOIS ) DEPARTMENT ON AGING, in her official capacity, NIRAV SHAH, DIRECTOR OF THE ILLINOIS DEPARTMENT OF PUBLIC HEALTH, in his official capacity, and FELICIA NORWOOD, ) DIRECTOR OF THE ILLINOIS DEPARTMENT OF HEALTHCARE AND FAMILY SERVICES, in her official capacity, JOHN R. BALDWIN, DIRECTOR ) OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, in his official capacity, MICHAEL HOFFMAN, ACTING DIRECTOR OF THE ILLINOIS DEPARTMENT OF CENTRAL MANAGEMENT SERVICES, in his official capacity, AUDRA HAMERNIK, EXECUTIVE DIRECTOR OF THE ILLINOIS HOUSING DEVELOPMENT AUTHORITY, in her official capacity, LESLIE GEISSER MUNGER, COMPTROLLER FOR THE STATE OF ILLINOIS, in her official capacity, and BRUCE RAUNER, GOVERNOR OF ILLINOIS, in his official capacity, ) Defendants. )

## FIRST AMENDED NOTICE OF APPEAL

PLAINTIFF-APPELLANTS Illinois Collaboration on Youth, Access Living of Metropolitan Chicago, Addus Healthcare Inc., AIDS Foundation of Chicago, Caritas Family Solutions, Center for Housing and Health, Center for youth and family solutions, Chicago Commons, Children's Home + Aid, Connections for the Homeless, DuPage Youth Services Coalition, Family Alliance, Inc., Family Focus, Fox Valley Older Adult Services, Haven Youth and Family Services, Heartland Human Care Services, Housing Opportunities for Women, Illinois Coalition Against Sexual Assault, Interfaith Housing Development Corporation, Inspiration Corp., Jewish Child and Family Services, Jewish Vocational Service and Employment Center, Kemmerer Village, Lessie Bates Davis Neighborhood House, Lutheran

Child and Family Services, Medical Gear, LLC, New Age Elder Care, New Moms, Metropolitan Family Services, OMNI Youth Services, One Hope United, Polish American Association, Project Oz, Puerto Rican Cultural Center, Shelter, Inc., Stephenson County Health Department, Stepping Stones of Rockford, Inc., The Baby Fold, The Fellowship House, The Night Ministry, Ounce of Prevention, Treatment Alternatives for Safe Communities, Universal Family Connection, Union County, Unity Parenting, Western Illinois Managed Home Services, Whiteside County Health Department, Youth Outreach Services, appeal to the Appellate Court of Illinois, First District, from the order and final judgment entered on August 31, 2016 by the Circuit Court of Cook County denying plaintiffs' motions for preliminary and permanent injunction and granting defendants' motions to dismiss under 735 ILCS§ 5/2-615 and 619 and entering final judgment against plaintiffs and in favor of defendants.

Respectfully submitted,

Dated: September 15, 2016

Thomas H. Geoghegan Michael P. Persoon Sean Morales-Doyle Despres, Schwartz & Geoghegan, Ltd. 77 West Washington Street, Suite 711 Chicago, Illinois 60602 (312) 372-2511

Cook County Attorney #70814

Thomas H. Geoghegan One of Plaintiffs' Attorneys

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## **CERTIFICATE OF SERVICE**

I, the undersigned, certify that the foregoing motion has been served upon the following by email before 5:00 pm on September 15, 2016:

Amy M. McCarthy Assistant Attorney General General Law Bureau 100 West Randolph Street, 13<sup>th</sup> Floor Chicago, IL 60601

Dated: September 15, 2016

Despres, Schwartz & Geoghegan, Ltd. 77 West Washington Street, Suite 711 Chicago, Illinois 60602 (312) 372-2511 mpersoon@dsgchicago.com Cook County Attorney No. 70814

Respectfully submitted,

Thomas H. Geoghegan

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