

5. Bailey has an absolute right to insist any executive order issued pursuant to The Act be lawful and not beyond the power granted to Pritzker by the legislature.
6. Immediate and irreparable harm is being suffered by Bailey every day which passes wherein he is being ordered by Pritzker to stay at home, or at his place of residence, as well as limiting his ability to travel within the state.
7. Bailey requires a temporary restraining order and preliminary injunction issue to enjoin enforcement of the terms of the March 20 Executive Order, as extended by the April 01 Executive Order, until the Court renders a final verdict in this matter.
8. Additionally, as of April 23, 2020, Pritzker publicly announced his intention to continue his ultra vires executive order until at least May 30, 2020.
9. Any such extension which is to be issued to continue the emergency orders would also be ultra vires.
10. Bailey has no other adequate remedy at law to prohibit enforcement against him until such time as the Court renders a final verdict in this matter.
11. There is a reasonable likelihood that Bailey will succeed on the merits of the case as shown by the Petition, and legal brief, both of which are incorporated herein by reference.

WHEREFORE, the Plaintiff, Darren Bailey, respectfully prays that this Court enter an order that provides for:

- A. Entry of a Temporary Restraining Order enjoining Pritzker, or anyone on his behalf, from taking any action to enforce the March 20, 2020 Executive Order against Darren Bailey; and

- B. Entry of a Temporary Injunction enjoining Pritzker, or anyone on his behalf, from taking any action to enforce the provisions of the March 20, 2019 Executive Order against Darren Bailey; and
- C. Entry of a Temporary Restraining Order enjoining Pritzker, or anyone on his behalf, from taking any action to enter further executive orders, continuances or otherwise, as a result of the COVID-19 disaster declaration which orders Darren Bailey to stay at home, or at his place of residence, as well as limiting his ability to travel within the state; and
- D. Entry of a Temporary Injunction enjoining Pritzker, or anyone on his behalf, from taking any action to enter further executive orders, continuances or otherwise, as a result of the COVID-19 disaster declaration which orders Darren Bailey to stay at home, or at his place of residence, as well as limiting his ability to travel within the state; and
- E. Such further relief as this Court deems just and equitable.

Respectfully submitted,

By: /s/ Thomas Devore
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VERIFICATION

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VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: 4-23, 2020

By: 

Darren Bailey