

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF ILLINOIS et al.,

Defendants.

No. 3:25-cv-01691-DWD

Honorable David W. Dugan

**STIPULATION AND JOINT MOTION TO SET A UNIFORM DEADLINE FOR ALL
DEFENDANTS TO FILE A CONSOLIDATED RESPONSE TO THE COMPLAINT**

The parties stipulate, and respectfully move the Court to order, as follows:

1. Defendants currently have the following deadlines to respond to the complaint under Federal Rule of Civil Procedure 12(a)(1)(A)(i):
 - a. October 3, 2025: Defendants State of Illinois, Governor JB Pritzker in his official capacity, Attorney General Kwame Raoul in his official capacity, and Board of Trustees of Southern Illinois University;
 - b. October 6, 2025: Defendant Board of Trustees of Rend Lake College;
 - c. October 10, 2025: Defendants Board of Trustees of the University of Illinois and Board of Trustees of Illinois State University; and
 - d. October 22, 2025: Defendants Board of Trustees of Chicago State University, Board of Trustees of Eastern Illinois University, Board of Trustees of Northeastern Illinois University, Illinois Student Assistance Commission, and Illinois DREAM Fund Commission.
2. In consideration of the agreement by Defendants Board of Trustees of Chicago State University, Board of Trustees of Eastern Illinois University, Board of Trustees of

Northeastern Illinois University, Illinois Student Assistance Commission, and Illinois DREAM Fund Commission to accept service via email to the Office of the Attorney General of Illinois; in consideration of the agreement by all Defendants to waive any defenses they may have under Federal Rule of Civil Procedure 12(b)(4); and in consideration of the agreement by all Defendants to file a consolidated response to the complaint, the parties stipulate that November 14, 2025, shall be the uniform deadline for all Defendants to file a consolidated response to the complaint.

3. The parties therefore respectfully move the Court to set November 14, 2025, as the uniform deadline for all Defendants to file a consolidated response to the complaint.

Dated: October 1, 2025

Respectfully submitted,

/s/ Alexandra McTague (with permission)
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