

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS

DARRIN WHITTEN, LISA C. KAISER, )  
WILLIAM D. KAISER, DORTHY TAFT, and )  
JARED KERWIN, )  
Plaintiffs, )  
v. ) No. 3:21-cv-03023  
ROCHESTER TOWNSHIP REPUBLICAN )  
CENTRAL COMMITTEE; Rochester Township )  
Republican Central Committeepersons, )  
THOMAS K. MUNROE, MARK C. WHITE, )  
ANTHONY SAPUTO, MATTHEW BUTCHER, )  
And DAVID ARMSTRONG, in their official )  
Capacities as Committeepersons for the )  
Rochester Township Republican Central )  
Committee; LYNN CHARD, in her official )  
Capacity as Clerk of Rochester Township; )  
DON GRAY, in his office capacity as Clerk )  
Of Sangamon County, and )  
DARRELL MAXHEIMER, )  
Defendants. )

**MOTION TO ADOPT DEFENDANT LYNN CHARD'S OBJECTION  
TO PLAINTIFFS' EMERGENCY MOTION FOR A TEMPORARY  
RESTRAINING ORDER, PRELIMINARY OR PERMANENT INJUNCTION  
PURSUANT TO FED. R. OF CIV. P. 10(c)**

NOW COMES, the Defendant, DARRELL MAXHEIMER, by and through his attorneys, CHERRY, FRAZIER & SABIN, LLP, and hereby adopts Defendant Lynn Chard's objection to Plaintiff's Emergency Motion for Temporary Restraining Order, Preliminary or Permanent Injunctive pursuant to Fed. R. of Civ. P. 10(c), states as follows:

1. Darrell Maxheimer is the current Road Commission for Rochester, Illinois, Township and is a Defendant in this matter.

Case No. 3:21-cv-03023

2. Defendant Maxheimer has been forced to retain an attorney to defend himself in not only this matter, but also in the previous state court action filed by the same Plaintiffs.

3. Defendant Maxheimer 's interest in this matter is identical to Defendants Chard's.

4. Fed. R. Civ. P. 10(c) allows for any party to adopt the pleadings of another party.

5. It is requested that Defendant Maxheimer be allowed to adopt not only the current pleadings by the Rochester Township Republican Central Committee, but all future pleadings as well.

WHEREFORE, the Defendant, DARRELL MAXHEIMER, respectfully requests this Honorable Court to allow the Defendant to adopt current and all future pleadings filed by the defendant's in this matter, pursuant to Fed R. Civ. P. 10(c).

Respectfully submitted,

DARRELL MAXHEIMER, Defendant

By: /s/ Richard D. Frazier  
One of His Attorneys

Richard D. Frazier (6193113)  
CHERRY, FRAZIER & SABIN, LLP  
Attorneys at Law  
1 West Old State Capitol Plaza, Ste 800  
Springfield, IL 62701  
Telephone: (217)753-4242  
Fax: (217)753-4642  
Email: [frazier@springfieldlawfirm.com](mailto:frazier@springfieldlawfirm.com)

Case No. 3:21-cv-03023

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system that will send notification of such filing to the following:

Rochester Township Republican Central Committee  
c/o Thomas K. Munroe  
[tslmunroe@gmail.com](mailto:tslmunroe@gmail.com)

Thomas K. Munroe  
[tslmunroe@gmail.com](mailto:tslmunroe@gmail.com)

Anthony Saputo  
[Anthonysaputo157@yahoo.com](mailto:Anthonysaputo157@yahoo.com)

Rochester Township Clerk Lynn Chard  
c/o Dwight H. O'Keefe  
[dokeefe@bhslaw.com](mailto:dokeefe@bhslaw.com)  
Dylan Grady  
[dgrady@bhslaw.com](mailto:dgrady@bhslaw.com)

Sangamon County Clerk Don Gray  
c/o State's Attorney Dan Wright & ASA San Mosher  
[dan.wright@co.sangamon.il.us](mailto:dan.wright@co.sangamon.il.us) and [dan.mosher@co.sangamon.il.us](mailto:dan.mosher@co.sangamon.il.us)

Samuel J. Cahnman  
[samcahman@yahoo.com](mailto:samcahman@yahoo.com)

Pericles C. Abbasi  
[chicagolaw@yahoo.com](mailto:chicagolaw@yahoo.com)

I hereby certify that on January 27, 2020, I mailed a copy of the foregoing to the individuals below, by placing a copy of in a sealed envelope, with fully prepaid postage, in and placing in the United States Post Office box.

Mark C. White  
113 E. Main  
Rochester, IL 62563

Case No. 3:21-cv-03023

Matthew Butcher  
609 Burberry Lane  
Rochester, IL 62563

David L. Armstrong  
215 Cumberland Drive  
Rochester, IL 62563

/s/ Richard D. Frazier

Richard D. Frazier (6193113)  
CHERRY, FRAZIER & SABIN, LLP  
Attorneys at Law  
1 West Old State Capitol Plaza, Ste 800  
Springfield, IL 62701  
Telephone: (217)753-4242  
Fax: (217)753-4642  
Email: [frazier@springfieldlawfirm.com](mailto:frazier@springfieldlawfirm.com)