

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

PATRICK QUINN, IRENE ROBINSON,  
ANTWAIN MILLER, MARC KAPLAN,  
CHRISTOPHER BALL, DANIEL  
MORALES-DOYLE, AND JITU BROWN

Plaintiffs,

v.

BOARD OF EDUCATION OF THE CITY OF  
CHICAGO; JAMES MEEKS, STEVEN  
GILFORD, MELINDA LABARRE, CURT  
BRADSHAW, LULA FORD, CRAIG  
LINDVAHL, ELIGIO CERDA PIMENTEL,  
CESILIE PRICE, AND JOHN SANDERS,  
MEMBERS TO THE ILLINOIS STATE  
BOARD OF EDUCATION, IN THEIR  
OFFICIAL CAPACITIES, AND STATE OF  
ILLINOIS

Defendants.

Case No. 2016-cv- 9514

Judge Elaine E. Bucklo

Magistrate Judge Sheila Finnegan

**STATE DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

Defendants James Meeks, Steven Gilford, Melinda LaBarre, Curt Bradshaw, Lula Ford, Craig Lindvahl, Eligio Cerda Pimentel, Cesilie Price, and John Sanders, the members of the Illinois State Board of Education, in their official capacities, and the State of Illinois (the "State Defendants"), by their attorney, Lisa Madigan, Illinois Attorney General, move for dismissal of Plaintiffs' claims against them for failure to state a claim, or in the alternative, for stay or dismissal of the claims against on abstention grounds. The grounds for this motion are set forth in State Defendants' Memorandum of Law in Support of their Motion to Dismiss Plaintiffs' Complaint and in Response to Plaintiffs' Motion for Preliminary Injunction, which they incorporate by reference.

LISA MADIGAN  
Attorney General of Illinois

Respectfully submitted,

/s/ Sarah H. Newman  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that the foregoing motion was filed through the Court's CM/ECF system on December 19, 2016. Parties of record may obtain a copy through the Court's CM/ECF system. The undersigned certifies that no party of record requires service of documents through any means other than the CM/ECF system.

/s/ Sarah H. Newman