

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

ELLEN MISHAGA,)	
)	
Plaintiff,)	No. 10-cv-03187-SEM
)	
v.)	
)	NOTICE
HIRAM GRAU, Director of the Illinois)	
Department of State Police; MICHAEL)	
W. VORREYER, Master Sergeant,)	
Illinois Department of State Police,)	
)	
Defendants.)	
)	

Plaintiff, Ellen Mishaga, by and through undersigned counsel, submits the following notice.

As demonstrated in Plaintiff’s Motion for Summary Judgment (Doc. 22), Illinois law generally prohibits possession of firearms and ammunition in Illinois, unless a person is also in possession of a Firearms Owner Identification card (“FOID”). Pl’s Mot. for Summ. J. at 7 (citing 430 ILCS 65/2(a)) (filed Oct. 3, 2011); *see also Mishaga v. Monken*, 753 F. Supp. 2d 750, 753 (C.D. Ill. 2010) (denying motion to dismiss for failure to state a claim).

In the two years since the parties’ cross-motions for summary judgment were briefed, Ms. Mishaga has made numerous visits to her friends in Illinois, suffering a violation of her constitutional rights with each visit. Indeed, the FOID Act residency requirement constitutes a “fixed harm” and inflicts irreparable injury “every day it remains on the books.” *Ezell v. City of Chicago*, 651 F.3d 684, 698–99 (7th Cir. 2011). Ms. Mishaga’s next trip to Illinois is scheduled to take place from November 16, 2013, through November 20, 2013.

DATED this 8th day of November 2013.

Respectfully submitted,

/s/ James M. Manley
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November 2013, I filed the foregoing document using the CM/ECF system and caused counsel of record to be served electronically through the CM/ECF system.

/s/ James M. Manley
James M. Manley, Esq.