

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

CALEB BARNETT, <i>et al.</i> , Plaintiffs, vs. KWAME RAOUL, <i>et al.</i> , Defendants.	Case No. 3:23-cv-209-SPM ** designated Lead Case
DANE HARREL, <i>et al.</i> , Plaintiffs, vs. KWAME RAOUL, <i>et al.</i> , Defendants.	Case No. 3:23-cv-141-SPM
JEREMY W. LANGLEY, <i>et al.</i> , Plaintiffs, vs. BRENDAN KELLY, <i>et al.</i> , Defendants.	Case No. 3:23-cv-192-SPM
FEDERAL FIREARMS LICENSEES OF ILLINOIS, <i>et al.</i> , Plaintiffs, vs. JAY ROBERT “JB” PRITZKER, <i>et al.</i> , Defendants.	Case No. 3:23-cv-215-SPM

**MOTION TO WITHDRAW APPEARANCE OF
ASSISTANT ATTORNEY GENERAL HAL DWORKIN**

Assistant Attorney General Hal Dworkin, counsel for Defendants Illinois Attorney General Kwame Raoul, Illinois State Police Director Brendan Kelly, and Illinois Governor JB Pritzker (collectively, the “State Defendants”) respectfully requests to withdraw his Appearance in this matter. In support of this motion, AAG Dworkin states as follows:

1. These consolidated lawsuits were each filed in January of 2023 following the Illinois General Assembly’s passage of the Protect Illinois Communities Act (Illinois Public Act No.

102-1116). They all initially proceeded on an emergency basis following Plaintiffs' motions for preliminary injunction.

2. AAsG Christopher Wells, Kathryn Muse, and Darren Kinkead were assigned to represent the State Defendants in these four cases, as well as three related cases in the Northern District of Illinois and additional cases challenge the Act in state courts. Given the number of lawsuits and the time constraints associated with responding to numerous emergency motions in various courts, they needed additional assistance with answering the complaints in the above-captioned lawsuits.

3. Consequently, AAG Laura Bautista and the undersigned counsel, AAG Dworkin, who works in a different division than AAsG Wells, Muse, and Kinkead, were assigned to assist with answering the complaints. Because AAG Dworkin's name was listed in the signature blocks in the Answers, he filed an Appearance in these consolidated cases.

4. After the Answers were filed, AAG Dworkin returned to his regular case load and has not continued to assist in defending these matters. In light of his lack of involvement in these matters over the past year and his responsibilities to other assigned cases, he now seeks to withdraw his Appearance from these consolidated actions.

5. Defense counsel of record AAsG Wells, Muse, Kinkead, and Bautista will continue to represent the State Defendants.

WHEREFORE, Assistant Attorney General Hal Dworkin respectfully requests that this Court withdraw his Appearance as counsel in this matter.

Respectfully submitted,

KWAME RAOUL
Attorney General
State of Illinois

/s/ Hal B. Dworkin
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