

**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

**STATE DEFENDANTS’ PRETRIAL SUBMISSION OF
DEPOSITION TRANSCRIPTS**

On September 6, 2024, Defendants Governor J.B. Pritzker, Attorney General of Illinois Kwame Raoul, and Director of the Illinois State Police Brendan Kelly (together, “State Defendants”) notified the Court that their written submissions for the final determination of these cases may rely on deposition transcripts from four witnesses. (ECF 222). At the Final Pre-Trial Conference held on September 9, 2024, the Court directed the parties to submit any deposition transcript on which it intends to rely before the trial begins on September 16. In accordance with that order and with paragraph 9 of the parties’ Joint Stipulation Regarding Expert Witnesses and Trial Procedure (approved by the Court at ECF 218) permitting the parties to submit certain deposition testimony, the State Defendants hereby submit the following deposition transcripts to the Court:¹

¹ These are the submissions of Defendants Raoul and Kelly in *Barnett, et al., v. Raoul, et al.*, No. 23-cv-209-SPM (S.D. Ill.) and *Harrel, et al., v. Raoul, et al.*, No. 23-cv-141-SPM (S.D. Ill.); Defendant Kelly in

Attachment 1: Transcript of July 18, 2024 Deposition of Jeffrey Eby (together with exhibits, Trial Exhibit 217).²

- Attachment 1.1: Exhibits 1, 5– 8 to Eby Transcript
- Attachment 1.2: Exhibit 2 to Eby Transcript
- Attachment 1.3: Exhibit 3 to Eby Transcript
- Attachment 1.4: Exhibit 4 to Eby Transcript

Attachment 2: Transcript of August 2, 2024 Deposition of James Ronkainen, with exhibits (Trial Exhibit 216).³

Attachment 3: Transcript of June 13, 2024 Deposition of James Curcuruto (together with exhibits, Trial exhibit 296).

- Attachment 3.1: Exhibits 1 to Curcuruto Transcript
- Attachment 3.2: Exhibit 2 to Curcuruto Transcript
- Attachment 3.3: Exhibit 3–5 to Curcuruto Transcript
- Attachment 3.4: Exhibit 6, part 1 of 2, to Curcuruto Transcript
- Attachment 3.5: Exhibit 6, part 2 of 2, to Curcuruto Transcript
- Attachment 3.6: Exhibit 7, part 1 of 3, to Curcuruto Transcript
- Attachment 3.7: Exhibit 7, part 2 of 3, to Curcuruto Transcript
- Attachment 3.8: Exhibit 7, Part 3 of 3, to Curcuruto Transcript
- Attachment 3.9: Exhibit 8–9 to Curcuruto Transcript

Attachment 4: Transcript of May 22, 2024 Deposition of Salam Fatohi, taken pursuant to Rule 30(b)(6) (together with exhibits, Trial Exhibit 297).⁴

- Attachment 4.1: Exhibits 1–5 to Fatohi Transcript
- Attachment 4.2: Exhibit 6 to Fatohi Transcript
- Attachment 4.3: Exhibits 7–11 to Fatohi Transcript
- Attachment 4.4: Exhibit 12 to Fatohi Transcript
- Attachment 4.5: Exhibit 13 to Fatohi Transcript
- Attachment 4.6: Exhibits 14–17 to Fatohi Transcript
- Attachment 4.7: Exhibit 18 to Fatohi Transcript
- Attachment 4.8: Exhibit 19, part 1 of 2, to Fatohi Transcript
- Attachment 4.9: Exhibit 19, part 1 of 2, to Fatohi Transcript
- Attachment 4.10: Exhibits 20–21 to Fatohi Transcript

Langley, et al., v. Kelly, et al., No. 23-cv-192-SPM (S.D. Ill.); and Defendants Pritzker, Raoul, and Kelly in *Federal Firearms Licensees of Illinois, et al., v. Pritzker, et al.*, No. 23-cv-215-SPM (S.D. Ill.).

² A copy of Mr. Eby's deposition transcript was filed at ECF 229-8 but without the deposition exhibits.

³ A copy of Mr. Ronkainen's transcript was filed at ECF 229-10 but without the deposition exhibits.

⁴ A copy of Mr. Fatohi's deposition, with exhibits, was previously filed with the Court on September 6 at ECF 223-3.

The State Defendants reserve their rights to use additional deposition transcripts to cross examine witnesses who testify at the upcoming trial. To the extent those witnesses have been disclosed by plaintiffs, those transcripts are listed in the Exhibit List provided to the Court on September 11 (e.g., Exhibits 215, 289, 295), and will be provided to the Court Deputy on a flash drive before trial pursuant to her emailed instructions.

Dated: September 13, 2024

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

By:

/s/ Gretchen Helfrich
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Governor Pritzker, and ISP Director Kelly*

CERTIFICATE OF SERVICE

The undersigned attorney certifies that she caused copies of the above **State Defendants' Pretrial Submission of Deposition Transcripts** to be served on all counsel of record by filing it via the Court's CM/ECF filing system.

/s/ Gretchen Helfrich
Gretchen Helfrich