

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

DANIEL LEE ROBINSON, )  
 )  
 Plaintiff, )  
 )  
 vs )  
 )  
 JEFF WOOD, in his individual capacity and in )  
 his official capacity as Edgar County Sheriff, )  
 JAY WILLAMAN, JESSE LEWSADER, )  
 EDGAR COUNTY, ILLINOIS, and CITY OF )  
 PARIS, ILLINOIS, a municipal corporation, )  
 )  
 Defendants. )

Case No. 20-cv-2341

Honorable Colin S. Bruce  
Magistrate Jonathan E. Hawley

**PLAINTIFF DANIEL LEE ROBINSON’S MOTION  
FOR PRELIMINARY INJUNCTION**

Plaintiff Daniel Lee Robinson (“Mr. Robinson”), through his counsel, coming pursuant to Fed.R.Civ.P. 65, hereby moves this Court to enter a preliminary injunction against Defendant Jeff Wood, in his official capacity and against Edgar County, Illinois.

Plaintiff further requests that he not be required to post bond pursuant to Fed.R.Civ.P. 65(c), because he is indigent and because the suit is about constitutional principles rather than commercial transactions.<sup>1</sup>

Plaintiff requests the following preliminary injunction relief:

1. Ensure that Mr. Robinson is immediately provided with both access to an

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<sup>1</sup> “That is why Rule 65(c) makes the effectiveness of a preliminary injunction contingent on the bond having been posted. *United States v. Associated Air Transport, Inc.*, 256 F.2d 857 (5th Cir. 1958); Charles Alan Wright & Arthur R. Miller, 11A *Federal Practice & Procedure* § 2954 at 319 (3d ed. 2013). A judge might consider an indemnity of \$0 (that is, no bond) “proper” when the suit is about constitutional principles rather than commercial transactions, but no one thinks that condition satisfied here. *BankDirect Capital Fin., LLC v. Capital Premium Fin., Inc.*, 912 F.3d 1054, 1057–58 (7th Cir. 2019)

outside medical provider for evaluation and adequate long-term medical treatment for the following serious medical conditions: bleeding from the penis; back and neck pain incurred on July 16, 2020 incident; dental care for a painful cracked tooth with cavity.

2. Ensure that Mr. Wood install a new, non-recorded telephone line on which Mr. Robinson will have the ability to talk with his criminal defense attorney at least once a week for at least thirty minutes without recording or monitoring the phone call and that Mr. Wood prohibit all Edgar County employees from confiscating Plaintiff's legal and attorney/client paperwork.

3. Ensure that Mr. Robinson be provided with his own paper copy of the Edgar County Orientation Manual.

4. Ensure that Mr. Robinson is provided with cleaning and sanitizing supplies in a sufficient amount to clean and sanitize his cell.

5. Ensure that Mr. Robinson be provided with some regular outdoor recreation and adequate heat to his cell.

6. Order the Edgar County Board to close the Edgar County Jail until such time that it meets minimum state, constitutional and insurance requirements.

7. Provide all other relief that the Court deems appropriate.

Dated: December 17, 2020

Respectfully Submitted,  
DANIEL LEE ROBINSON  
By: /s/ Jude M. Redwood  
Jude Marie Redwood  
ARDC # 6257623  
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P.O. Box 864  
St. Joseph, IL 61873  
Phone (217) 469-9194  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2020, I electronically filed the foregoing *Plaintiff Daniel Lee Robinson's Motion for Preliminary Injunction* with the Clerk of the Court using the ECF system, which will send notification of such filing to all attorneys who have entered appearance in this cause and I have served a paper copy of the aforesaid motion on all unrepresented parties by placing same in a properly addressed envelope and mailing with first class postage affixed, on December 18, 2020 to:

Jeff Wood  
c/o Sheriff Dept.  
228 N. Central  
Paris, IL 61944

Jay Willaman  
c/o Sheriff Dept.  
228 N. Central  
Paris, IL 61944

Jesse Lewsader  
c/o Paris Police Dept.  
211 W. Washington St.  
Paris, IL 61944

August Griffin  
County Clerk Office  
Edgar County Courthouse  
115 W. Court St.  
Paris, IL 61944

Brooke Newhart  
City Clerk Office  
206 S. Central  
Paris, IL 61944

/s/ Jude M. Redwood

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