STATE OF ILLINOIS IN THE CIRCUIT COURT OF THE 17^{TH} JUDICIAL CIRCUIT COUNTY OF WINNEBAGO

GREGORY DEPPE,

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Plaintiff,

Case No.: 2025-MR-69

KELLY OLSON-FUCA, individually and in her Capacity as Pecatonica Township Clerk, and LORI GUMMOW, in her capacity as the Winnebago County Clerk.

Defendants.

MOTION TO CONSOLIDATE

The above-named Plaintiff, Gregory Deppe, by his attorneys, BOLGRIEN, KOEPKE

& KIMES, LLC, by Rodney W. Kimes, and moves this Honorable Court to consolidate Case

No. 2025-MR-70 into Case No. 2025-MR-69 and as reasons set forth the following:

- 1. Both actions involves the same Defendants.
- 2. Both actions involves the same allegations
- 3. Common Questions of law and fact exist in both suits
- 4. No party will be prejudiced by the consolidation.

WHEREFORE, the Plaintiff prays of this Honorable Court to consolidate Case No.

2025-MR-70 into Case No. 2025-MR-69, both cases to proceed under general number 2025-MR-69.

Dated this 21st day of February, 2025.

BOLGRIEN, KOEPKE & KIMES, LLC Attorneys for Plaintiff

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RODNEY W. KIMES

By:

Prepared by: Rodney W. Kimes, (#06231105) 419 Main Street, PO Box 537 Pecatonica, IL 61063 <u>rkimes@bolgirenlaw.com</u> 608-365-7702