

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

MICHAEL MOORE, CHARLES HOOKS,)
PEGGY FECHTER, JON MAIER, SECOND)
AMENDMENT FOUNDATION, INC., and)
ILLINOIS CARRY,)

Plaintiffs,)

v.)

Case No. 3:11-CV-3134

LISA MADIGAN, in her official capacity as)
Attorney General of the State of Illinois, and)
HIRAM GRAU, in his official capacity as)
Director of the Illinois State Police,)

Defendants.)

_____)

MOTION FOR SANCTIONS

Come now Plaintiffs, Michael Moore, Charles Hooks, Peggy Fechter, Jon Maier, Second Amendment Foundation, Inc. and Illinois Carry, by and through counsel, and respectfully move this Honorable Court, pursuant to this Court’s inherent supervisory powers and 28 U.S.C. § 1927, to sanction Defendants’ counsel for unreasonably and vexatiously multiplying this litigation.

This motion, providing Defendants’ counsel with notice and an opportunity to be heard, asserts the Court should hold, on Plaintiffs’ forthcoming “fees on fees” motion, that Defendants’ counsel are liable for the additional fees and costs of litigating this fee dispute arising from their vexatious, bad faith conduct in opposing the fee petition.

This Motion is made upon the attached Memorandum in support of said Motion, the material in the Court's file, and any other matter deemed relevant to the determination of the Motion.

Dated: July 1, 2014

Respectfully submitted,

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