

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL L. SHAKMAN, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No. 69 C 2145
COOK COUNTY RECORDER OF	)	
DEEDS, et al.,	)	Chief Magistrate Judge Schenkier
	)	
Defendants.	)	
	)	
	)	

**RECORDER COMPLIANCE ADMINSTRATOR’S  
RESPONSE TO COOK COUNTY RECORDER OF DEEDS’  
MOTION TO AMEND EXEMPT LIST**

Cardelle B. Spangler, Shakman Compliance Administrator for the Cook County Recorder of Deeds (“RCA”), by and through her attorney Matthew D. Pryor, responds to the Cook County Recorder of Deeds’ (the “Recorder”) Motion to Amend the Exempt List (the “Motion”) as follows:

1. The RCA wishes to respond to the statement in the Recorder’s Motion that she had “no objections to the proposed amendment” to the Recorder’s current Exempt List.
2. The RCA has not informed the Recorder that she has no objections to her Motion. Indeed, the mechanism set forth in the Recorder’s Employment Plan (the “Plan”) that permits the RCA to provide a recommendation in favor of or against the Recorder’s proposed amendments to the Exempt List has not yet been triggered.

3. Section XI.C of the Plan provides: “[i]f Plaintiffs’ Counsel sends a written objection of the proposed change to the Exempt List to the Head of HRD, Recorder and Director of Compliance within (10) business days of the Recorder providing written notice of the Director of Compliance’s approval of the Exempt change, the Position will not be placed on the Exempt List and the matter shall be referred to the Recorder Compliance Administrator, while acting, for a recommendation and then to the court having jurisdiction in the Shakman Case for final resolution.” Plan § IX.C.2.

4. The matter of amending the Exempt List has not been referred to the RCA for recommendation in accordance with Plan § XI.C.2.

5. Accordingly, the RCA has not told the Recorder that she has no objections to the proposed amendment to the Exempt List, but will provide her recommendations at the time prescribed by the Plan or as this Court otherwise requires.

Respectfully submitted,

Cardelle B. Spangler  
Recorder Compliance Administrator

By: /s/ Matthew D. Pryor

Matthew D. Pryor  
Counsel to Cardelle Spangler  
69 West Washington, Suite 840  
Chicago, IL 60602  
(312) 603-8911 (p)  
matthew.d.pryor@gmail.com