

No.

In the
Appellate Court of Illinois
First Judicial District

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File Date: 5/21/2026 1:51 PM
Tina M. Schillaci
Clerk of the Appellate Court
APPELLATE COURT 1ST DISTRICT

LISABETH GANSBERG,
Petitioner in Discovery-Respondent,
v.

ELI BEER, MICHAEL LITTENBERG-BROWN, and JERRY SILVERMAN,
Respondents in Discovery-Petitioners,

FRIENDS OF UNITED HATZALAH, INC.,
Respondent in Discovery.

Appeal from the Circuit Court of Cook County, Illinois,
County Department, Law Division, No. 2026-L-001683.
The Honorable **Stephanie Saltouros**, Judge Presiding.

**SUPPORTING RECORD OF RESPONDENTS IN DISCOVERY ELI
BEER, MICHAEL LITTENBERG-BROWN, AND JERRY SILVERMAN**

COMMON LAW RECORD

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*Counsel for Respondents in Discovery Eli Beer,
Michael Littenberg-Brown, and Jerry Silverman*

No. _____

**IN THE APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT**

LISABETH GANSBERG,
Petitioner-Respondent,

V.

ELI BEER and MICHAEL LITTENBERG-BROWN,
Respondents in Discovery-Petitioners,

and

FRIENDS OF UNITED HATZALAH,
INC. and JERRY SILVERMAN,
Respondents in Discovery.

On Appeal from the
Circuit Court of Cook County, IL
Law Division

No. 2026-L-001683

Honorable Stephanie Saltouros

**AFFIDAVIT AND CERTIFICATION OF SUPPORTING RECORD
PURSUANT TO ILLINOIS SUPREME COURT RULE 328**

1. The undersigned is counsel for Respondents in Discovery-Petitioners Eli Beer, Michael Littenberg-Brown, and Jerry Silverman.

2. Pursuant to Illinois Supreme Court Rule 328, the undersigned hereby certifies that he has prepared and certified this Supporting Record in the form required for transmission to the reviewing court. It consists of:

One volume of Common Law Record

One volume of Report of Proceedings

Zero volumes or descriptions of Exhibits.

3. A detailed table of contents of the Supporting Record accompanies the Appendix and each volume of the Supporting Record.

5. Under penalties as provided by law pursuant to Section 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: May 21, 2026

/s/David J. Stein

David J. Stein

David J. Stein
Kara E. Angeletti
GREENBERG TRAURIG, LLP
360 N. Green St.
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Chicago, Illinois 60607
Phone: (312) 456-8400

*Attorneys for Respondents in Discovery-Petitioners,
Eli Beer, Michael Littenberg-Brown, and Jerry Silverman*

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Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
36623272

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

LISABETH GANSBERG
Petitioner,
v.
ELI BEER, MICHAEL LITTENBERG-
BROWN, JERRY SILVERMAN and
FRIENDS OF UNITED
HATZALAH, INC.,
Respondents.

**VERIFIED PETITION FOR DISCOVERY
PURSUANT TO ILLINOIS SUPREME COURT RULE 224**

INTRODUCTION

1. Petitioner Lisabeth Gansberg brings this Verified Petition for Discovery pursuant to Ill. S. Ct. R. 224, for the sole and limited purpose of identifying the legal entities and individuals that exercised employer authority over her and that may be responsible in damages to her under Illinois law.

2. The instant Petition relates to violations of Illinois law stemming from the employment and termination of Petitioner by her employer(s), in violation of numerous Illinois laws including but not limited to violations of the Illinois Human Rights Act (“IHRA”), 775 ILCS 5/1 *et seq.*, and the Illinois Wage Payment and Collection Act (“IWPCA”), 820 ILCS 115/1 *et seq.*

3. Petitioner does not seek to litigate the merits of any claim, to establish liability, or to obtain discovery for any purpose other than determining the identity, legal status, and capacity of potential defendants prior to the filing of a complaint. The discovery sought is narrowly tailored to clarify the existence, identity, and role of certain domestic and foreign entities and the capacity in

which individual respondents acted, where those facts are not publicly available and are uniquely within the possession and control of Respondents.

4. This Petition arises from material and unresolved ambiguity concerning whether Petitioner's employment relationship, supervision, compensation, and termination were undertaken solely by Friends of United Hatzalah, Inc., or instead by or on behalf of additional unidentified entities, including Israeli and other foreign organizations operating through overlapping leadership, governance, and contractual structures, and whether individual respondents acted in their own capacities or as agents of such unidentified entities.

5. Contemporaneous conduct, communications, titles, contractual relationships, and operational authority reflected shifting and inconsistent entity affiliations among key decision-makers over the course of Petitioner's employment and at the time of her termination.

6. These inconsistencies prevent Petitioner from determining which entities and individuals exercised employer authority and made the employment decisions at issue.

7. Absent limited discovery under Rule 224, Petitioner cannot determine whom to properly name as defendants, risks omitting necessary parties, and risks misidentifying the legal entities responsible for the acts at issue.

THE PARTIES

Petitioner

8. Petitioner Lisabeth Gansberg ("Petitioner" or "Gansberg") is a resident of the State of Illinois.

9. Beginning on or about August 2, 2023 and continuing until December 3, 2025, Petitioner provided services in Illinois to an organization she reasonably understood to be Friends of United Hatzalah, Inc., and to related individuals who exercised supervisory, operational, and decision-making authority over her employment.

Respondent - Friends of United Hatzalah, Inc.

10. Friends of United Hatzalah, Inc. (“FoUH”) is a New York not-for-profit corporation recognized as tax-exempt under Section 501(c)(3) of the Internal Revenue Code.

11. FoUH represents itself as the United States fundraising arm of an organization commonly referred to as United Hatzalah.

12. FoUH conducts fundraising and operational activities nationwide, including in Illinois, and employs or engages individuals who work within Illinois.

Respondent - Eli Beer

13. Upon information and belief, Respondent Eli Beer is an individual who resides outside the State of Illinois.

14. Beer is publicly identified as:

- a. the President of FoUH on federal tax filings; and
- b. the Founder and President of United Hatzalah, an Israeli emergency medical services organization.

15. Beer performed fundraising activities on behalf of FouH, in Illinois.

16. In addition to his fundraising role with Friends of United Hatzalah, Inc., Beer has performed executive and operational activities within the United States, including Illinois, in connection with Israeli and other foreign entities using the United Hatzalah name and brand.

Respondent - Michael Littenberg-Brown

17. Upon information and belief, Respondent Michael Littenberg-Brown (“Brown”) is an individual who resides outside the State of Illinois.

18. Brown is publicly identified as Vice President of FoUH on federal tax filings.

19. During Petitioner's employment and at the time of her termination, Brown also held himself out in communications, contracts, and organizational materials as the Chief Executive Officer of an entity described as "United Hatzalah International" or "UH International."

20. Brown hired Petitioner while using the title Vice President of FoUH, supervised her during her employment, and terminated her employment while using the title Chief Executive Officer of United Hatzalah International.

21. Brown performed executive, managerial, and operational functions in the United States, including Illinois, and executed contracts on behalf of entities identified alternately as FoUH and United Hatzalah International during Petitioner's employment.

Respondent Jerry Silverman

22. Respondent Jerry Silverman ("Silverman") is one of the individuals who, at all relevant times, exercised direct supervisory and operational authority over Petitioner's day-to-day work.

23. Silverman directed Petitioner's daily activities, assigned tasks, evaluated performance, conducted Petitioner's performance review, approved compensation-related decisions, and served as a primary point of contact regarding Petitioner's work responsibilities. In practice, Silverman functioned as one of Petitioner's immediate supervisors and instructed Petitioner as to what work was to be performed and how it was to be performed.

24. Upon information and belief, Silverman was not an employee or officer of FoUH but instead operated pursuant to one or more contractual arrangements with FoUH and/or other affiliated or unidentified entities.

25. Petitioner has never been provided with, and does not have access to, the contract or contracts pursuant to which Silverman acted on behalf of FoUH and/or other affiliated or unidentified entities. The existence, terms, and scope of those contractual arrangements are not publicly available.

26. Silverman used an organizational electronic mail address associated with FoUH, and held himself out as having authority to direct Petitioner's work and to make or influence employment-related decisions. The source and scope of that authority remain unclear.

27. As a result, Petitioner cannot determine whether Mr. Silverman acted in his individual capacity, on behalf of a legal entity he owned or controlled, as an agent of FoUH or on behalf of other unidentified domestic or foreign entities.

UNIDENTIFIED ENTITIES AND/OR INDIVIDUALS

28. Publicly available materials, internal communications, and organizational representations repeatedly refer to an "international" organization associated with United Hatzalah and identify individuals as holding executive titles in connection with that organization.

29. Brown has been described as the Chief Executive Officer of United Hatzalah International.

30. Beer has been described as Founder and President of United Hatzalah with authority extending beyond FoUH.

31. Silverman has represented that United Hatzalah International includes or oversees FoUH.

32. Despite these representations, no legal entity named United Hatzalah International, UH International, or United International has been identified in any jurisdiction through diligent searches of domestic and foreign corporate, nonprofit, and tax records. No separate tax filings, corporate registrations, governing documents, or organizational disclosures identifying such an entity have been located.

33. Petitioner cannot determine whether the referenced international organization is a legally formed entity, an unincorporated association, a division or trade name of another entity, or a

descriptive designation used without reference to a distinct legal entity, nor whether it exercised employer authority over Petitioner.

JURISDICTION AND VENUE

34. This Court has jurisdiction pursuant to Illinois Supreme Court Rule 224.

35. Venue is proper in Cook County, Illinois because the acts and omissions giving rise to Petitioner's need for discovery occurred in Cook County, including Petitioner's employment, supervision, compensation, and termination, and because Respondents conducted business and exercised authority in Illinois.

LEGAL STANDARD

36. Illinois Supreme Court Rule 224 provides a procedural mechanism by which a person may obtain limited discovery prior to filing suit where the identity of a person or entity who may be responsible in damages is unknown. Illinois Supreme Court Rule 224(a)(1)(i).

37. The Rule is designed to permit discovery for the narrow purpose of identifying proper defendants and clarifying legal relationships that cannot reasonably be ascertained through publicly available sources. The petition must be verified and must set forth the reason the discovery is necessary and the nature of the discovery sought. Illinois Supreme Court Rule 224(a)(1)(ii).

38. Rule 224 does not permit discovery on the merits of claims, and Petitioner expressly disclaims any such intent. The Petition seeks only that discovery necessary to determine which entities and individuals exercised employer authority and decision-making power with respect to Petitioner.

CORRESPONDENCE SUPPORTING THE APPLICATION OF ILCS RULE 224

39. On November 7, 2025, Brown informed Petitioner that December 1, 2025 would be her last day.

40. On December 17, 2025, Petitioner caused to be delivered correspondence to Beer and Brown, in their individual capacities. This correspondence concerned a series of claims, not enumerated above, against Beer and Brown individually, not FouH.

41. On December 18, 2025, Petitioner received a response from Jessica Cortes of the law firm Davis + Gilbert LLP, indicating that she had been provided the aforementioned correspondence by Brown. Ms. Cortes did not identify the individual(s), entity, or entities she represented, nor did she clarify whether she was authorized to speak on behalf of Brown, Beer, Silverman, FouH, UH, United Hatzalah International, or any affiliated entities, domestic or international.

42. On December 19, 2025, Petitioner replied to Ms. Cortes requesting clarification regarding the scope of her representation and the identity of the entity or entities on whose behalf she was responding; Ms. Cortes did not respond.

43. On December 26, 2025, Petitioner received a letter from the law firm of Greenberg Traurig, LLP stating that the firm represented FouH, Beer, and Brown.

44. It further stated that the law firm of Davis + Gilbert LLP and Ms. Cortes only represented FouH (not Beer and Brown).

45. In support of the instant Petition, the letter asserted that Petitioner was conflating FouH, UH, their leaders, board members, and roles.

NECESSITY OF DISCOVERY

46. Petitioner cannot determine, without limited discovery, the identity of the legal entity or entities that employed her under Illinois law; the entity or entities on whose behalf Respondents Beer, Littenberg-Brown, and Silverman acted; whether Respondents acted in their individual capacities

or as agents of unidentified domestic or foreign entities; whether an entity described as United Hatzalah International exists as a legal entity; and, if so, its jurisdiction of formation, governance structure, and role in United States operations.

47. Absent discovery identifying the entities and individuals that exercised employer authority over Petitioner, she cannot determine against whom to assert claims arising from her employment, supervision, compensation, and termination under Illinois law.

48. This information is not publicly available and is uniquely within Respondents' possession and control.

49. The instant Petition is the only mechanism available to obtain this information prior to filing suit.

NATURE OF DISCOVERY SOUGHT

50. Without the limited discovery sought herein, Petitioner cannot identify the proper Defendants or determine which entities and individuals are liable for alleged violations of Illinois law. Absent Rule 224 discovery, Petitioner risks naming the wrong defendants and/or omitting necessary parties and prejudicing their ability to timely pursue their claims.

51. Petitioner seeks leave to serve narrowly tailored written discovery and, if necessary, limited depositions solely to identify the:

- a. legal identity and structure of all entities that exercised employer authority over Petitioner;
- b. capacity in which Respondents Beer, Littenberg-Brown, and Silverman acted;
- c. The existence, legal status, and governance of any international or foreign entity directing United States operations; and
- d. The contractual relationships under which Respondents exercised supervisory or decision-making authority.

PRAYER FOR RELIEF

WHEREFORE Petitioner respectfully requests that this Court enter an Order authorizing limited discovery pursuant to Illinois Supreme Court Rule 224 consistent with the purposes stated herein and granting such other relief as the Court deems just and proper.

Dated: February 11, 2026

Respectfully submitted,

/s/ Haskell Garfinkel
One of Petitioner's Attorneys

Garfinkel Group, LLC
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Andrew Fullett (ARDC No. 6328490)
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The CIVITAS
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Chicago, Illinois 60642
(312) 736-7991

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Lisabeth Gansberg
Lisabeth Gansberg (Feb 11, 2026 15:30:35 CST)

Lisabeth Gansberg

Feb 11, 2026

Date

Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, Z

FILED
2/17/2026 6:43 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
36700686

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,

Petitioner,

v.

FRIENDS OF UNITED
HATZALAH, INC., ELI BEER,
MICHAEL LITTENBERG-BROWN,
and JERRY SILVERMAN,

Respondents.

No. 2026L001683

Hon. Stephanie Saltouros

Calendar Z

SUMMONS

To: Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman
244 Madison Avenue
New York, New York 10016

You are summoned and required to file an answer to the petition in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than 30 days after its date.

Witness _____

(Seal of Court)



2/17/2026 6:43 PM Mariyana T. Spyropoulos

Clerk of Court

Petitioner's Attorney:

The Garfinkel Group, LLC
701 N. Milwaukee Ave.
Chicago, IL 60712
Haskell Garfinkel
haskell@garfinkelgroup.com
(312) 736-7991

Date of service _____, 20__ (to be inserted by officer on copy left with defendant or other person).

FILED
2/11/2026 4:02 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG

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v.

ELI BEER, MICHAEL LITTENBERG-
BROWN, JERRY SILVERMAN and
FRIENDS OF UNITED
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No. 2026L001683

**VERIFIED PETITION FOR DISCOVERY
PURSUANT TO ILLINOIS SUPREME COURT RULE 224**

INTRODUCTION

1. Petitioner Lisabeth Gansberg brings this Verified Petition for Discovery pursuant to Ill. S. Ct. R. 224, for the sole and limited purpose of identifying the legal entities and individuals that exercised employer authority over her and that may be responsible in damages to her under Illinois law.

2. The instant Petition relates to violations of Illinois law stemming from the employment and termination of Petitioner by her employer(s), in violation of numerous Illinois laws including but not limited to violations of the Illinois Human Rights Act ("IHRA"), 775 ILCS 5/1 *et seq.*, and the Illinois Wage Payment and Collection Act ("IWPCA"), 820 ILCS 115/1 *et seq.*

3. Petitioner does not seek to litigate the merits of any claim, to establish liability, or to obtain discovery for any purpose other than determining the identity, legal status, and capacity of potential defendants prior to the filing of a complaint. The discovery sought is narrowly tailored to clarify the existence, identity, and role of certain domestic and foreign entities and the capacity in

For updated information about your case, including hearings, subsequent filings and other case information, please visit our Online Case Search and search for your case: <https://casearch.cookcountyclerkofcourt.org>

C012

which individual respondents acted, where those facts are not publicly available and are uniquely within the possession and control of Respondents.

4. This Petition arises from material and unresolved ambiguity concerning whether Petitioner's employment relationship, supervision, compensation, and termination were undertaken solely by Friends of United Hatzalah, Inc., or instead by or on behalf of additional unidentified entities, including Israeli and other foreign organizations operating through overlapping leadership, governance, and contractual structures, and whether individual respondents acted in their own capacities or as agents of such unidentified entities.

5. Contemporaneous conduct, communications, titles, contractual relationships, and operational authority reflected shifting and inconsistent entity affiliations among key decision-makers over the course of Petitioner's employment and at the time of her termination.

6. These inconsistencies prevent Petitioner from determining which entities and individuals exercised employer authority and made the employment decisions at issue.

7. Absent limited discovery under Rule 224, Petitioner cannot determine whom to properly name as defendants, risks omitting necessary parties, and risks misidentifying the legal entities responsible for the acts at issue.

THE PARTIES

Petitioner

8. Petitioner Lisabeth Gansberg ("Petitioner" or "Gansberg") is a resident of the State of Illinois.

9. Beginning on or about August 2, 2023 and continuing until December 3, 2025, Petitioner provided services in Illinois to an organization she reasonably understood to be Friends of United Hatzalah, Inc., and to related individuals who exercised supervisory, operational, and decision-making authority over her employment.

Respondent - Friends of United Hatzalah, Inc.

10. Friends of United Hatzalah, Inc. ("FoUH") is a New York not-for-profit corporation recognized as tax-exempt under Section 501(c)(3) of the Internal Revenue Code.

11. FoUH represents itself as the United States fundraising arm of an organization commonly referred to as United Hatzalah.

12. FoUH conducts fundraising and operational activities nationwide, including in Illinois, and employs or engages individuals who work within Illinois.

Respondent - Eli Beer

13. Upon information and belief, Respondent Eli Beer is an individual who resides outside the State of Illinois.

14. Beer is publicly identified as:

- a. the President of FoUH on federal tax filings; and
- b. the Founder and President of United Hatzalah, an Israeli emergency medical services organization.

15. Beer performed fundraising activities on behalf of FouH, in Illinois.

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Respondent - Michael Littenberg-Brown

17. Upon information and belief, Respondent Michael Littenberg-Brown ("Brown") is an individual who resides outside the State of Illinois.

18. Brown is publicly identified as Vice President of FoUH on federal tax filings.

19. During Petitioner's employment and at the time of her termination, Brown also held himself out in communications, contracts, and organizational materials as the Chief Executive Officer of an entity described as "United Hatzalah International" or "UH International."

20. Brown hired Petitioner while using the title Vice President of FoUH, supervised her during her employment, and terminated her employment while using the title Chief Executive Officer of United Hatzalah International.

21. Brown performed executive, managerial, and operational functions in the United States, including Illinois, and executed contracts on behalf of entities identified alternately as FoUH and United Hatzalah International during Petitioner's employment.

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22. Respondent Jerry Silverman ("Silverman") is one of the individuals who, at all relevant times, exercised direct supervisory and operational authority over Petitioner's day-to-day work.

23. Silverman directed Petitioner's daily activities, assigned tasks, evaluated performance, conducted Petitioner's performance review, approved compensation-related decisions, and served as a primary point of contact regarding Petitioner's work responsibilities. In practice, Silverman functioned as one of Petitioner's immediate supervisors and instructed Petitioner as to what work was to be performed and how it was to be performed.

24. Upon information and belief, Silverman was not an employee or officer of FoUH but instead operated pursuant to one or more contractual arrangements with FoUH and/or other affiliated or unidentified entities.

25. Petitioner has never been provided with, and does not have access to, the contract or contracts pursuant to which Silverman acted on behalf of FoUH and/or other affiliated or unidentified entities. The existence, terms, and scope of those contractual arrangements are not publicly available.

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LEGAL STANDARD

36. Illinois Supreme Court Rule 224 provides a procedural mechanism by which a person may obtain limited discovery prior to filing suit where the identity of a person or entity who may be responsible in damages is unknown. Illinois Supreme Court Rule 224(a)(1)(i).

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CORRESPONDENCE SUPPORTING THE APPLICATION OF ILCS RULE 224

39. On November 7, 2025, Brown informed Petitioner that December 1, 2025 would be her last day.

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51. Petitioner seeks leave to serve narrowly tailored written discovery and, if necessary, limited depositions solely to identify the:

- a. legal identity and structure of all entities that exercised employer authority over Petitioner;
- b. capacity in which Respondents Beer, Littenberg-Brown, and Silverman acted;
- c. The existence, legal status, and governance of any international or foreign entity directing United States operations; and
- d. The contractual relationships under which Respondents exercised supervisory or decision-making authority.

PRAYER FOR RELIEF

WHEREFORE Petitioner respectfully requests that this Court enter an Order authorizing limited discovery pursuant to Illinois Supreme Court Rule 224 consistent with the purposes stated herein and granting such other relief as the Court deems just and proper.

Dated: February 11, 2026

Respectfully submitted,

/s/ Haskell Garfinkel
One of Petitioner's Attorneys

Garfinkel Group, LLC
Haskell Garfinkel (ARDC No. 6274971)
haskell@garfinkelgroup.com
Andrew Fullett (ARDC No. 6328490)
andrew@garfinkelgroup.com
The CIVITAS
701 N. Milwaukee Avenue
Chicago, Illinois 60642
(312) 736-7991

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Lisabeth Gansberg
Lisabeth Gansberg (Feb 11, 2026 15:30:35 CST)

Lisabeth Gansberg

Feb 11, 2026

Date

Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, Z

FILED
3/17/2026 3:53 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
37147937

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	No. 2026L001683
	)	
vs.	)	Hon. Stephanie Saltouros
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Calendar Z
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN.	)	
	)	
	)	
Respondents	)	

**NOTICE AND ACKNOWLEDGMENT OF RECEIPT OF SUMMONS AND
PETITION**

To: Friends of United Hatzalah, Inc., ~~Eli Beer~~
~~Michael Littenberg-Brown, Jerry Silverman~~
244 Madison Avenue
New York, New York 10016

The enclosed summons and petition are served pursuant to Section 2-213 of the Illinois Code of Civil Procedure.

You must complete the acknowledgment part of this form and return one copy of the completed form to the sender within 30 days from the date this request was sent.

You must sign and date the acknowledgment. If you are served on behalf of a corporation, unincorporated association (including a partnership), or other entity, you must indicate under your signature your relationship to that entity. If you are served on behalf of another person and you are authorized to receive process, you must indicate under your signature your authority.

If you do not complete and return the form within the required time, you (or the party on whose behalf you are being served) may be served in another manner permitted by law.

If you do complete and return this form, you (or the party on whose behalf you are being served) must answer the complaint within 60 days from the date this request was sent. If you

fail to do so, judgment by default may be entered against you for the relief demanded in the complaint.

I declare, under penalty of perjury, that this notice and acknowledgment of receipt of summons and complaint will have been mailed on February 19, 2026.

ACKNOWLEDGMENT OF RECEIPT OF SUMMONS AND COMPLAINT

I declare, under penalty of perjury, that I received a copy of the summons and complaint in the above-captioned matter at:

Name: David Stein - Greenberg Traurig, LLP

Address: 360 N. Green Street, Suite 1300

City: Chicago State: IL Zip: 60607

Email: David.Stein@gtlaw.com

Relationship to Entity/Authority to Receive Service of Process: Attorney/Legal Representative on behalf of Friends of United Hatzaleh only

Dated: 2/27/2026



Signature

E-filing is mandatory for civil cases with limited exemptions. Visit <http://efile.illinoiscourts.gov/service-providers.htm> for more information.

Date: 3/18/2026

CIRCUIT COURT OF COOK COUNTY
LAW DIV. RM. 801, DALEY CENTER.
CHICAGO IL-60602

Gansberg Lisabeth

-

GARFINKEL GROUP LLC
HASKELL@GARFINKELGROUP.COM

Notice of In Person Case Management

CASE: 2026L001683 / Lisabeth Gansberg-vs-Eli Beer,Michael Littenberg Brown,Jerry Silverman,Friends o

All Law Division Motion Calendar Initial Case Management dates will be held In Person,
In-Person Court Date: Tuesday April 21 2026 09:45 AM
Room Court Room 2204 Calendar Z
For all questions on the initial CMC date,
email: LAW.CALZcc@cookcountyil.gov or phone: (312) 603-4646

Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, Z

For updated information about your case, including hearings, subsequent filings
and other case information, please visit our Online Case Search
and search for your case: <https://casesearch.cookcountyclerkofcourt.org>

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

FILED
4/7/2026 2:37 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
37474044

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	No. 2026 L 001683
	)	
v.	)	Hon. Stephanie Saltouros
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Calendar Z
ELI BEER,	)	
MICHAEL LITTENBERG-BROWN, and	)	
JERRY SILVERMAN,	)	
	)	
Respondents.	)	

**PETITIONER'S MOTION FOR ISSUANCE OF ALIAS SUMMONSES AND FOR
ORDER OF COURT AUTHORIZING ALTERNATIVE SERVICE ON RESPONDENTS
ELI BEER AND MICHAEL LITTENBERG-BROWN**

Petitioner, Lisabeth Gansberg, by her attorneys, The Garfinkel Group, LLC, moves for entry of an order (1) directing the Clerk to issue alias summonses for Respondents Eli Beer and Michael Littenberg-Brown, and (2) authorizing special-order service on Beer and Brown pursuant to Ill. S. Ct. R. 102(f). In support, Petitioner states as follows:

INTRODUCTION

This motion presents a straightforward service problem with a straightforward solution. Eli Beer and Michael Littenberg-Brown are named respondents. Summons has been issued. Counsel acknowledged representing them, but refused to waive service on their behalf. Petitioner then undertook diligent inquiry to locate their current physical addresses for service. That inquiry established that Beer resides in Israel and Brown resides in Switzerland, but did not produce reliable current residential addresses at which service can in good faith be attempted. Because traditional service is impractical and their present addresses remain unknown despite diligent inquiry, Petitioner

seeks a special order authorizing service by electronic means reasonably calculated to provide actual notice.

Illinois law specifically allows this type of relief. Ill. S. Ct. R. 103(a) instructs the Clerk to issue alias summonses upon request. Ill. S. Ct. R. 224(a)(2) provides that summons shall issue as in other civil cases. Ill. S. Ct. R. 102(f) authorizes the Court to direct service in a manner consistent with due process when personal or abode service is impractical. In addition, where a respondent's address is not known despite diligent inquiry, the Hague Service Convention does not bar the requested relief. The motion therefore should be granted and the attached proposed order entered.

FACTUAL BACKGROUND

- 1) On February 11, 2026, Petitioner filed this action pursuant to Ill. S. Ct. R. 224 against Friends of United Hatzalah, Inc. ("FoUH"), Eli Beer, Michael Littenberg-Brown, and Jerry Silverman, and a summons was issued as to all Respondents. The petition alleges that Beer and Brown reside outside Illinois and exercised fundraising, executive, managerial, and operational authority in the United States, including Illinois. Petitioner's Verified Petition for Discovery Pursuant to Ill. S. Ct. R. 224 ¶¶ 13, 15–17, 21.
- 2) Petitioner has conducted diligent inquiry to locate current reliable physical addresses for Beer and Brown but has been unable to identify such addresses. See Exhibit A- Affidavit of Haskell Garfinkel ¶¶ 5-18.
- 3) As set forth in the Garfinkel Affidavit, Beer is believed to reside in Israel and Brown is believed to reside in Switzerland. *Id.* ¶¶ 6-7, 16.
- 4) As set forth in the Garfinkel Affidavit, counsel for respondents acknowledged representation of Beer and Brown but expressly refused to waive service for them. *Id.* ¶¶ 19-21.

5) Petitioner has, however, identified electronic means reasonably calculated to provide actual notice to Beer and Brown, including e-mail addresses and active public-facing online accounts associated with them. Id. ¶¶ 22-28.

ARGUMENT

I. Alias Summonses

Ill. S. Ct. R. 103(a) is mandatory: upon request of any party, the clerk shall issue successive alias summonses, regardless of the disposition of any summons or alias summons previously issued. Because summonses previously issued and service has not been accomplished, Petitioner is entitled to alias summonses as to Beer and Brown.

II. Special-Order Service Is Authorized Because Traditional Service Is Impractical.

Ill. S. Ct. R. 224(a)(2) directs that summons shall issue as in other civil cases. Ill. S. Ct. R. 102(f) permits the Court to order service of summons, the petition, and other required documents in a manner consistent with due process when service by the methods otherwise provided is impractical.

Personal service and abode service are impractical because, despite diligent inquiry, Petitioner has been unable to identify reliable current residential addresses for Beer and Brown. Garfinkel Aff. ¶¶ 5-18. Petitioner's investigation reflects both diligent inquiry and reasonable efforts to identify addresses at which ordinary service could responsibly be attempted. No such address was located. Under these circumstances, special-order service is appropriate.

III. The Hague Service Convention Does Not Bar Relief Because Beer's and Brown's Addresses Are Unknown Despite Diligent Inquiry.

Article 1 of the Hague Service Convention provides that the Convention shall not apply where the address of the person to be served is not known. Hague Service Convention art. 1, Nov. 15, 1965, 20 U.S.T. 361, 362; see also *Braverman Kaskey, P.C. v. Toidze*, 599 F. App'x 448, 452 (3d Cir. 2015).

Here, despite diligent inquiry, Petitioner has not identified reliable current residential addresses for Beer or Brown. The Convention therefore does not bar the relief requested.

IV. The Proposed Electronic Means Are Reasonably Calculated To Give Actual Notice.

Ill. S. Ct. R. 102(f) expressly permits service by e-mail, social-media direct message, text message, or a combination of those methods when the Court is satisfied the respondent has access to and the ability to use the technology at issue. The supporting affidavit must state why the movant believes the respondent recently sent and received transmissions from the specified e-mail address or maintains an active account on the identified social-media platform.

Petitioner satisfies that standard. As set forth in the Garfinkel Affidavit, Petitioner has identified specific e-mail addresses and active public-facing online accounts associated with Beer and Brown, together with facts showing those channels are currently used in connection with their organizational and public activities. Garfinkel Aff. ¶¶ 22-29. Under these circumstances, service by those electronic means is reasonably calculated to provide actual notice and is more likely to do so than continued efforts to serve at unknown physical addresses.

V. The Court Should Direct Mailing To The Last Known Residence To The Extent Rule 102(f) Requires.

Ill. S. Ct. R. 102(f)(3) further provides that within ten days after special-order service, the plaintiff or petitioner shall send by mail a copy of the summons, petition, and any other required documents to the defendant's last known residence.

Petitioner will comply with that requirement to the extent the necessary information exists. As to Brown, the most recent United States address located through Westlaw appears to have been used in 2024 and appears to be his parents' residence. Garfinkel Aff. ¶¶ 12-15. Although that address does not provide a good-faith basis for personal service, it is the only last-known residential address

Petitioner has located and can be used for the mailing required by Ill. S. Ct. R. 102(f)(3). As to Beer, despite diligent inquiry, Petitioner has not identified any last-known residential address. Petitioner therefore requests an order directing the Rule 102(f)(3) mailing to Brown's last-known residence and otherwise recognizing that no last-known residence for Beer has been identified despite diligent inquiry, without prejudice to further relief if such an address is later discovered or the Court directs additional steps.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court enter an order:

- a) directing the Clerk to issue alias summonses for Respondents Eli Beer and Michael Littenberg-Brown;
- b) authorizing special-order service on Beer and Brown pursuant to Ill. S. Ct. R. 102(f) by the electronic means set forth in the supporting affidavit;
- c) directing Petitioner to mail copies of the summonses, petition, and any other required documents within ten days to Brown's last-known residential address in compliance with Rule 102(f)(3), and otherwise granting such mailing-related relief as the Court deems appropriate as to Beer; and
- d) granting such other and further relief as this Court deems just.

FILED DATE: 4/7/2026 2:37 PM 2026L001683

Respectfully submitted,

/s/ Haskell Garfinkel
One of Petitioner's Attorneys

April 7, 2026

THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
(312) 736-7991
haskell@garfinkelgroup.com
ARDC # 6274971

**[PROPOSED] ORDER GRANTING PETITIONER'S MOTION FOR ISSUANCE OF
ALIAS SUMMONSES AND FOR SPECIAL ORDER OF COURT AUTHORIZING
ALTERNATIVE SERVICE**

This matter coming to be heard on Petitioner's Motion for Issuance of Alias Summonses and for Special Order of Court Authorizing Alternative Service on Respondents Eli Beer and Michael Littenberg-Brown pursuant to Ill. S. Ct. R. 102(f), due notice having been given, and the Court being fully advised in the premises,

IT IS HEREBY ORDERED:

- 1) Petitioner's motion is granted.
- 2) The Clerk of the Court is directed to issue alias summonses for Respondents Eli Beer and Michael Littenberg-Brown.
- 3) The Court finds that service upon Respondents Eli Beer and Michael Littenberg-Brown by the methods otherwise provided by law is impractical.
- 4) The Court further finds that Petitioner has made diligent inquiry into the whereabouts of Respondents Eli Beer and Michael Littenberg-Brown and, despite such inquiry, has been unable to ascertain reliable current physical addresses for service upon them.
- 5) Pursuant to Ill. S. Ct. R. 102(f), Petitioner is authorized to serve the alias summonses, the Rule 224 Petition, this Order, and any other required documents upon Respondent Eli Beer by the following means: (a) by e-mail to eli@israelrescue.org; and (b) by direct message to Instagram account @eli_beer.
- 6) Pursuant to Ill. S. Ct. R. 102(f), Petitioner is authorized to serve the alias summonses, the Rule 224 Petition, this Order, and any other required documents upon Respondent Michael Littenberg-Brown by the following means: (a) by e-mail to michael@israelrescue.org; and (b) by direct message to Facebook account Michael Littenberg-Brown.

- 7) Service under this Order shall be effected by transmitting PDF copies of the alias summons, Petition, this Order, and any other required documents through each of the authorized methods above.
- 8) Petitioner shall promptly file proof describing the date and manner of each transmission made pursuant to this Order.
- 9) Within ten days after effecting service under this Order, Petitioner shall send by mail copies of the alias summons, Petition, this Order, and any other required documents to Michael Littenberg-Brown's last-known residential address identified in the supporting affidavit.
- 10) As to Eli Beer, the Court finds that, despite diligent inquiry, Petitioner has not identified a last-known residential address. This Order is without prejudice to Petitioner's seeking further relief concerning any Rule 102(f)(3) mailing or other service-related issue if additional address information is later identified or the Court directs additional steps.
- 11) This Order is without prejudice to Petitioner's seeking further relief concerning service if any authorized method proves unsuccessful or if additional electronic accounts or contact information are identified.

ENTERED:

Hon. Stephanie Saltouros
Judge of the Circuit Court

Dated: _____

EXHIBIT A

**AFFIDAVIT OF HASKELL GARFINKEL IN SUPPORT OF MOTION FOR ISSUANCE
OF ALIAS SUMMONSES AND FOR SPECIAL ORDER OF COURT AUTHORIZING
ALTERNATIVE SERVICE**

I, Haskell Garfinkel, state as follows:

1) I am an attorney licensed to practice law in the State of Illinois and counsel for Petitioner, Lisabeth Gansberg, in this matter.

2) I make this affidavit in support of Petitioner's motion for issuance of alias summonses and for special-order service on Respondents Eli Beer and Michael Littenberg-Brown pursuant to Illinois Supreme Court Rule 102(f) and 735 ILCS 5/2-203.1.

3) If called as a witness, I could and would testify competently to the matters stated in this affidavit. The facts stated herein are based on my personal knowledge, my review of the file and records in this matter, and the investigation undertaken by me and under my direction.

4) Summons previously issued in this matter as to Beer and Brown.

5) I have undertaken, and directed my office to undertake, diligent inquiry and reasonable efforts to identify current reliable physical addresses for Beer and Brown at which service could in good faith be attempted.

6) Based on that inquiry, Beer is believed to reside in Israel.

7) Based on that inquiry, Brown is believed to reside in Switzerland.

8) As to Beer, my investigation included review of publicly available internet search results, publicly available organizational websites associated with Friends of United Hatzalah, United Hatzalah, and related entities, publicly available social-media materials, publicly available press and event materials, and correspondence already in counsel's possession.

9) Those efforts did not reveal a reliable current residential address for Beer.

10) I did not identify a current physical address for Beer at which I could in good faith direct personal or abode service.

11) As to Brown, my investigation included the same categories of publicly available materials, as well as Westlaw.

12) Westlaw did not reveal a current reliable residential address for Brown.

13) The most recent residential address located for Brown through Westlaw appears to have been used in 2024.

14) Based on my investigation, that address appears to be his parents' residence rather than Brown's current residence or usual place of abode.

15) I therefore do not believe that address provides a reliable or good-faith basis for personal service on Brown, although it is the only last-known residential address I have located for mailing purposes.

16) Other publicly available materials reviewed during my investigation indicated an association between Brown and Switzerland, including Geneva, but did not disclose a reliable current residential address for him.

17) Despite diligent inquiry, I have been unable to ascertain current reliable residential addresses for Beer or Brown and have not identified addresses at which I could responsibly direct personal or abode service.

18) Because no reliable current address is known for either Beer or Brown, I have been unable to direct Hague service to an identified address for either respondent.

19) On February 26, 2026, David Stein of Greenberg Traurig wrote that Greenberg Traurig represented Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman.

20) In that same correspondence, Mr. Stein stated: "We have authority to waive service on behalf of FoUH only, but not for the individual Respondents. We will return the waiver of service shortly as to FoUH only."

21) Accordingly, although counsel acknowledged representing Beer and Brown, counsel refused to waive service on their behalf.

22) Through my investigation, I identified electronic means reasonably calculated to provide actual notice to Beer and Brown.

23) I identified the following e-mail addresses associated with them through public-facing organizational materials and/or materials reviewed in the investigation:

- a. Eli Beer: eli@israelrescue.org
- b. Michael Littenberg-Brown: michael@israelrescue.org

24) I identified the following public-facing online or social-media accounts associated with them:

- a. Eli Beer: Instagram @eli_beer
- b. Michael Littenberg-Brown: Facebook @Michael Littenberg-Brown

25) I believe those accounts and addresses are active because they appear on current public-facing organizational materials and, based on public review on April 7, 2026, Beer maintained an Instagram account showing a Passover post from April 2026 and Brown maintained a Facebook profile reflecting activity updated on August 28, 2025. I also relied on the most recent e-mail addresses in use by Beer and Littenberg-Brown before Petitioner's termination and on their current positions and titles as reflected on United Hatzalah's current website.

26) I further believe those electronic channels are reasonably likely to provide actual notice because Beer and Brown use public-facing electronic channels in connection with organizational, fundraising, executive, and public communications activity.

27) Based on the investigation described above, service by personal delivery or abode service is impractical as to Beer and Brown.

28) Based on the same investigation, service by the e-mail addresses and online accounts identified above is more likely to provide actual notice than attempts at physical service of unknown addresses.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies that he verily believes the same to be true.

/s/ Haskell S. Garfinkel

Haskell Garfinkel

Dated: April 7, 2026

CERTIFICATE OF SERVICE

The undersigned certifies that on April 7, 2026, a true and correct copy of the following:

1. Petitioner's Motion for Issuance of Alias Summonses and for Special Order of Court Authorizing Alternative Service on Respondents Eli Beer and Michael Littenberg-Brown;
2. Affidavit of Haskell Garfinkel; and
3. [Proposed] Order Granting Petitioner's Motion for Issuance of Alias Summonses and for Special Order of Court Authorizing Alternative Service on Respondents Eli Beer and Michael Littenberg-Brown
- 4.

was served via e-mail upon the following counsel of record:

David H. Stein
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
steind@gtlaw.com
Attorney for Respondents Friends of United Hatzalah, Inc.,
Eli Beer, Michael Littenberg-Brown, and Jerry Silverman

Dated: April 7, 2026

/s/ Haskell Garfinkel

Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, Z

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

FILED
4/15/2026 2:54 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
37606148

FILED DATE: 4/15/2026 2:54 PM 2026L001683

LISABETH GANSBERG,

Petitioner,

v.

FRIENDS OF UNITED HATZALAH, INC.,
ELI BEER,
MICHAEL LITTENBERG-BROWN, and
JERRY SILVERMAN,

Respondents.

Case No. 2026L001683

Hon. Stephanie Saltouros

Calendar Z

NOTICE OF MOTION

To: Attorney for Respondents Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman

David H. Stein
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
steind@gtlaw.com

PLEASE TAKE NOTICE that on April 21, 2026, at 9:45 a.m., or as soon thereafter as counsel may be heard, counsel for Petitioner shall appear before the Honorable Stephanie Saltouros, or any judge sitting in her stead, in Courtroom 2204, Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois, and shall then and there present Petitioner's Motion for Issuance of Alias Summonses and for Order of Court Authorizing Alternative Service on Respondents Eli Beer and Michael Littenberg-Brown, a copy of which has previously been filed with the Court on April 7, 2026, and which is served on you concomitant with this notice.

FILED DATE: 4/15/2026 2:54 PM 2026L001683

Respectfully submitted,

By: */s/ Haskell Garfinkel*
One of Petitioner's Attorneys

Dated: April 15, 2026

THE GARFINKEL GROUP, LLC
Haskell S. Garfinkel
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
(312) 736-7991
haskell@garfinkelgroup.com
ARDC No. 6274971

CERTIFICATE OF SERVICE

The undersigned certifies that on April 15, 2026, he caused a true and correct copy of the foregoing Notice of Motion to be served via email upon the following:

David H. Stein
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
steind@gtlaw.com

Attorney for Respondents Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown,
and Jerry Silverman

/s/ Haskell Garfinkel
Haskell Garfinkel

Appearance/Jury Demand

(12/01/24) CCL 0530

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG

Plaintiff

Case No. 2026 L 001683

v.

FRIENDS OF UNITED HATZALAH, INC.,
ELI BEER, MICHAEL LITTENBERG-BROWN, and
JERRY SILVERMAN

Defendant

Calendar: Z

APPEARANCE/JURY DEMAND

☒ **General Appearance**

☒ **0900 - Appearance - Fee Paid**

☐ **0909 - Appearance- No Fee**

☐ **0904 - Appearance Filed - Fee Waived**

☐ **Jury Demand**

☐ **1900 - Appearance & Jury Demand - Fee Paid**

☐ **1909 - Appearance & Jury Demand - No Fee**

The undersigned enters the appearance of: ☐ **Plaintiff** ☐ **Defendant**

☐ **Additional Party**

☒ **Respondent-in-discovery**

Friends of United Hatzaleh, Inc.

Litigant's Name

/s/ David J. Stein

Signature

☒ **INITIAL COUNSEL OF RECORD**

☐ **PRO SE**

☐ **ADDITIONAL APPEARANCE**

☐ **SUBSTITUTE APPEARANCE**

A copy of this appearance shall be given to all parties who have appeared and have not been found by the Court to be in default.

Mariyana T. Spyropoulos, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

☒ **Atty. No.:** 36511 ☐ **Pro Se** 99500

Name: David J. Stein | Greenberg Traurig, LLP

Atty. for (if applicable):

Respondent | Friends of United Hatzaleh, Inc.

Address: 360 North Green Street, Suite 1300

City: Chicago

State: IL **Zip:** 60607

Telephone: (312) 456-1003

Primary Email: David.Stein@gtlaw.com

Pro Se Only:

☐ **I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:**

FILED DATE: 4/17/2026 10:28 AM 2026L001683

FILED
4/20/2026 4:24 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
37676128

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

**RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S COMBINED 2-619.1
MOTION TO DISMISS PETITIONER'S VERIFIED PETITION FOR DISCOVERY**

Respondent Friends of United Hatzalah, Inc. ("FoUH"), pursuant to 735 ILCS 5/2-619.1 and Illinois Supreme Court Rule 224, moves to dismiss Petitioner Lisabeth Gansberg's ("Petitioner") Verified Petition for Discovery Pursuant to Illinois Supreme Court Rule 224 (the "Petition").¹ In support, FoUH states:

INTRODUCTION

Petitioner knowingly filed a faulty Petition that, on its face, identifies potential defendants for her purported employment-related claims. The Petition also falls woefully below Petitioner's burden to plead a viable cause of action sufficient to justify her need for pre-suit discovery. Accordingly, this Court should dismiss the Petition with prejudice.

BACKGROUND

Petitioner was employed as a Midwest Regional Director at FoUH from approximately August 2023 through November 2025. There can be no dispute that Petitioner knows that FoUH

¹ Petitioner filed her Petition against FoUH and three individuals (Eli Beer, Michel Littenberg-Brown and Jerry Silverman (collectively "the Individual Respondents")). The Individual Respondents have not been served. However, the arguments made by FoUH in this Motion apply equally to the Individual Respondents, and the Petition should be dismissed with prejudice as to all four Respondents.

was her employer. She has known her employer's identity at least since July 24, 2023, when she accepted FoUH's offer of employment. Ex. A, R. Spodek Affidavit at Ex. 1 (Offer Letter). Petitioner's final pay record also confirms this fact. Ex. A, Spodek Aff. at Ex. 2 (Sample Pay Stub). In fact, before she filed the Petition, she even acknowledged this fact. Ex. B, Dec. 17, 2025 Letter (identifying Petitioner as a "former employee of Friends of United Hatzalah, Inc.").²

Despite this knowledge, on February 17, 2026, Petitioner filed a Rule 224 Petition against FoUH and the Individual Respondents (collectively "Respondents"), seeking pre-suit discovery from the four Respondents in order to identify potential defendants for her alleged forthcoming lawsuit. Pet., ¶ 1 (Feb. 17, 2026). The Petition does not include any specific factual or legal allegations for the claim(s) that Petitioner plans to file. *See generally* Pet. Instead, Petitioner vaguely references that she may seek relief for "violations of Illinois law stemming from the employment and termination of Petitioner by her employer(s), in violation of numerous Illinois laws including but not limited to violations of the Illinois Human Rights Act [(the "IHRA")]. . . and the Illinois Wage Payment and Collection Act [(the "IWPCA").]" Pet. at ¶ 2.

The Petition identifies FoUH as Petitioner's employer. Pet. at ¶ 9. It also appears to implicate the Individual Respondents as decisionmakers of her employer. *See* Pet. at ¶¶ 14-16, 18, 20-21, 24. Notwithstanding that Petitioner has already identified her employer and potential individual defendants against whom she asserts she may have a claim, *see* Exs. A-B; *see also* Pet. at ¶¶ 9, 22, 40—Petitioner still opted to file the Petition.

After receiving the Petition, Respondents contacted Petitioner to remind her, once again, that FoUH was her employer. *See* Ex. C, Feb. 26, 2026 Letter at 2 ("To the extent that you believe

² Petitioner referred to the December 17, 2025 letter in her Petition but did not attach it. *See* Pet. at ¶ 40. FoUH attached a redacted excerpt here for the limited purpose of demonstrating that Petitioner knows the identity of her employer.

there is any ambiguity into who Ms. Gansberg's employer was, she was employed by FoUH.""). Because Petitioner has always known who her employer was – and also knows the identity of the Individual Respondents that Petitioner has asserted may also bear liability – Respondents requested that Petitioner dismiss the Petition to avoid the necessity of this Motion and the Court's time and resources. Petitioner declined, claiming, among other things, that pre-suit discovery was necessary to identify whether "other entities also exercised employer authority." Ex. D, Mar. 10, 2026 Letter. Respondents followed up again, reminding Petitioner that because she knows the identity of at least one potential defendant, her conduct in filing a defective Rule 224 Petition could be cause for an award of attorneys' fees. Ex. E, Mar. 26, 2026 Letter.

ARGUMENT

I. Legal Standard.

Illinois Supreme Court Rule 224 allows a plaintiff to institute a request for pre-suit discovery "for the sole purpose of ascertaining the identity of one who may be responsible in damages[.]" A Rule 224 petition is subject to the same standards of dismissal as a complaint, including under 735 ILCS 5/2-615 and 735 ILCS 5/2-619. *See Stone v. Paddock Pubs., Inc.*, 2011 IL App (1st) 093386, at ¶ 18 (discussing section 2-615 standard for Rule 224 petitions); *Medlock v. Plains All Am. Pipeline, L.P.*, 2016 IL App (5th) 160034-U, at ¶ 1 (discussing section 2-619 standard for Rule 224 petitions). A section 2-615 motion challenges the legal sufficiency of the complaint based on the face of the pleading. *Goldwater v. Greenberg*, 2017 IL App (1st) 163003, at ¶ 9. A section 2-619 motion challenges the pleading on other affirmative matters, including bases outside of the complaint that the court may consider. *Medlock*, 2016 IL App (5th) 160034-U at ¶ 21.

II. Under Section 2-619, the Petition Confirms Rule 224 Discovery Is Not Necessary.

Petitioner has already identified, in the Petition, potential defendants in her alleged employment-related action – including her employer, FoUH. “A Rule 224 petition allows discovery of the identity of a potential defendant whose identity is not already known. . . . Once the identity of such a person or entity has been ascertained, the purpose of Rule 224 has been achieved and the action should be dismissed.” *Low Cost Movers, Inc. v. Craigslist, Inc.*, 2015 IL App (1st) 143955, at ¶ 12 (internal citations and quotations omitted), ¶ 13 (collecting cases holding same). Consequently, after a petitioner under Rule 224 knows of a single potential defendant that is connected to the alleged injury, further discovery under Rule 224 is precluded. *Id.* at ¶ 16 (affirming dismissal of Rule 224 petition where petitioner learned that respondent committed act for which petitioner aimed to seek liability).

A petitioner is not entitled to Rule 224 discovery in order to identify *additional* potential defendants. *Id.* at ¶¶ 9, 16. This remains true even if the known defendant does not comport with the petitioner’s intended theories of liability. *Id.* at ¶¶ 9, 17. To this end, a Rule 224 petition is “invalid from the outset” if the petitioner already knows the identity of at least one potential defendant when filing the petition. *Ingram v. Intili*, 2022 IL App (1st) 210656, at ¶ 16 (affirming petition dismissal where petitioner knew of at least two defendants).

Here, although Petitioner has not specifically identified her claims, she has alleged that her eventual complaint “relates to violations of Illinois law stemming from the employment and termination of Petitioner by her employer(s)[.]” Pet. at ¶ 2; *id.* at ¶ 47 (describing claims as “arising from [Petitioner’s] employment, supervision, compensation and termination under Illinois law”). Petitioner knew who her employer was while she was employed (and even before her employment

started, when she signed her offer letter). *See* Exs. A, B.³ Petitioner admits as much in the Petition, which alleges she worked for FoUH. Pet. at ¶ 9. And, after she filed the Petition, she was once again reminded that FoUH was her employer, when FoUH requested that she dismiss the Petition for this very reason. Exs. C, E. FoUH acknowledges, as it always has, that it is Petitioner’s employer. Petitioner also already knows the identities of the Individual Respondents against whom she purportedly has claims. *See* Pet. at ¶¶ 14-16, 18-21, 22-23, 26, 40; *see also* Ex. C (identifying Individual Respondents by name and implying liability). Petitioner’s alleged confusion as to the nature of Respondents’ legal representation, Pet. at ¶¶ 39-45 – as well as her references to distinct international organizations and speculation as to the Individual Respondents’ roles within those organizations, Pet. at ¶¶ 28-33, 47 – do not change these facts.

The Petition confirms that the nature of the discovery that Petitioner seeks is not necessary. First, Petitioner seeks the identity of her employer, a question to which she has long had the answer. *See* Pet. at ¶ 51(a). Likewise, Petitioner also seeks discovery that goes to whether Respondents would be *liable*, not who they actually are. *See* Pet. at ¶ 51(b, d) (seeking discovery sufficient to identify whether Individual Respondents were acting in their individual capacities and the “contractual relationships” governing Respondents’ supervisory authority); *see also* Pet. at ¶¶ 20-21, 26-27 (alleging “confusion” as to whether Brown and/or Silverman should be liable). In defending the Petition, Petitioner even admitted that both her theory of liability and the purpose of her Petition is based in part on her allegation that individuals may have acted outside their scope of employment and “us[ed] FoUH as a shield.” Ex. D at 3. Again, Rule 224 only permits discovery into defendants’ identities; it does not permit discovery into theories of liability as to those

³ This Court may consider the exhibits in ruling on a Section 2-619 motion to dismiss a Rule 224 petition. *See Medlock*, 2016 IL App (5th) 160034-U at ¶¶ 23 (affirming dismissal of petition under section 2-619 and confirming court could rely on attachments containing “easily proved issues of fact” attached to the motion).

defendants. *Ingram*, 2022 IL App (1st) 210656 at ¶ 9, 17. Petitioner further acknowledged in her March 10th letter that the Petition seeks information as to “[a]ll [p]ersons and [e]ntities [p]otentially [l]iable in [d]amages.” *See* Ex. D at 2; *see also* Pet. at ¶ 51(c). But Rule 224 is not the appropriate vehicle to achieve this goal. *See, e.g., Ingram*, 2022 IL App (1st) 210656 at ¶¶ 9, 16.

At bottom, the Petition serves no purpose because Petitioner already knows the identities of not just one, but *four* potential defendants for her employment-related claims. Because the Petition is “frivolous and inapplicable,” and has been from the start, this Court should dismiss the petition with prejudice.⁴ *See id.* at ¶ 16 (affirming Rule 137 sanctions against petitioner who pursued petition after identifying potential defendant and sought discovery beyond names, which “exceeded the scope” Rule 224).

III. Under Section 2-615, Petitioner Did Not Meet Her Pleading Burden.

Even if Petitioner did not know of a single potential defendant, the Petition does not contain allegations that would support any cause of action. A Rule 224 petition is required to include “allegations sufficient to overcome a section 2-615 motion to dismiss.” *Stone*, 2011 IL App (1st) 093386 at ¶ 18. “[I]f a petitioner cannot satisfy the section 2-615 standard, it is clear that the unidentified individual is not responsible for damages and the proposed discovery is not ‘necessary.’” *Id.* (citation omitted). This standard balances the rights of both the petitioner seeking pre-suit discovery and the unidentified individual(s) or entity(ies). *Id.* Notably, the burden is on the petitioner to “show that the discovery is necessary, *i.e.*, that petitioner can allege facts supporting a cause of action.” *Id.* The Petition falls well below this standard.

⁴ As of the filing of this Motion, FoUH was the only Respondent who had been served and thus is the only Respondent filing this Motion. However, dismissal with prejudice as to all Respondents is still proper because of this fatal flaw in the Petition.

First, Petitioner has failed to identify any specific cause of action for which she purportedly needs to identify a defendant. *See generally* Pet. Petitioner admits as much in her March 10th letter. Ex. D at 2 (noting Petition “asserts no causes of action against FoUH or anyone else”). Second, even if this Court were to consider the vague references to “Illinois law,” the IHRA, and the IWPCA, Petitioner does not specify what the alleged violations actually are. *See* Pet. at ¶ 2. Third, regardless of whether the Petition contains any enumerated cause of action, Petitioner did not allege *any* meaningful facts to support a lawsuit. *See generally* Pet. This failure in particular has made it impossible to discern what the alleged violations related to Petitioner’s employment even *could* be – under either the referenced statutes or any other legal theory. Because the Petition cannot survive a section 2-615 motion, this Court should dismiss the Petition.

IV. Petitioner’s Conduct Should be Sanctioned.

Petitioner filed a faulty Petition from the outset, which warrants sanctions against Petitioner in the form of FoUH’s attorneys’ fees to oppose the Petition. Under Illinois Supreme Court Rule 137, this Court may impose sanctions for a pleading, like a Rule 224 petition, that does not reasonably comport with facts or existing law. Ill. Sup. Ct. R. 137(a); *see also Ingram*, 2022 IL App (1st) 210656 at ¶¶ 16, 19. Courts have held that sanctions are appropriate where a plaintiff knows the identity of at least one defendant but still decides to file and pursue a Rule 224 petition. *Id.* at ¶ 16 (affirming sanctions for faulty Rule 224 petition where petitioner knew at least one potential defendant’s identity). This is especially true where the respondent from which discovery is sought confirms for the petitioner the identity of the potential defendant. *Id.* at ¶ 17 (criticizing petitioner for not terminating petition once he was provided with additional requested name). Sanctions are likewise appropriate where the petition seeks discovery that goes beyond the purpose

of the Rule. *Id.* (criticizing petitioner for seeking pre-suit discovery that pertained to theory of liability, as opposed to identity).

Petitioner has known all along that FoUH was her employer. Before filing the Petition, Petitioner has also known the identities of the Individual Respondents, against whom she indicates she has claims. Even if she thinks there may be other potential defendants, this is more than enough information for Petitioner to file her employment-related claims. Yet she filed the Petition anyway. Since then, she has been reminded at least twice that FoUH was her employer, when FoUH requested that she dismiss the Petition. She has declined to do so. In her refusal, Petitioner also stands by inappropriate requests for discovery that extend well beyond the scope of the Rule. *See supra*, at II. These overbroad requests confirm that Petitioner initiated a harassing proceeding to obtain information that is already – and always has been – in her possession. Accordingly, Petitioner should be required to pay for FoUH’s attorneys’ fees in responding to this frivolous Petition.

CONCLUSION

Petitioner is not entitled to pre-suit discovery. From the beginning, Petitioner has been aware of the identities of potential defendants, rendering her Petition frivolous. To make matters worse, she has not even attempted to plead facts that would support a legitimate cause of action that could justify the need for discovery. Accordingly, this Court should dismiss the Petition with prejudice and grant FoUH attorneys’ fees for being forced to respond.

WHEREFORE, FoUH respectfully requests this Court grant its Motion to Dismiss, dismiss the Petition with prejudice, award FoUH its attorneys’ fees incurred in opposing the Petition, and grant any other relief this Court deems equitable and just.

Dated: April 20, 2026

Respectfully submitted,

FRIENDS OF UNITED HATZALAH, INC.

By: /s/ David J. Stein

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Attorneys for Respondent

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on April 20, 2026, the foregoing **RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S COMBINED 2-619.1 MOTION TO DISMISS PETITIONER'S VERIFIED PETITION FOR DISCOVERY** was served via the Odyssey Illinois electronic filing system upon all counsel of record listed below.

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
haskell@garfinkelgroup.com

/s/ David J. Stein

FILED DATE: 4/20/2026 4:24 PM 2026L001683

EXHIBIT A

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

AFFIDAVIT OF ROBERT SPODEK

I, Robert Spodek, pursuant to 735 ILCS 5/1-109, hereby declare as follows:

1. I am the Chief Financial Officer at Friends of United Hatzalah, Inc. ("FoUH").
2. I make this Affidavit in support of FoUH's Combined 2-619.1 Motion to Dismiss Petitioner Lisabeth Gansberg's ("Petitioner") Verified Petition for Discovery.
3. I am over the age of eighteen. I make this Affidavit based on my personal knowledge, as well as my review of FoUH's business records maintained in the ordinary course of its business. If called upon by a court of law, I would and could competently testify to the facts set forth in this Affidavit.
4. In my role as Chief Financial Officer, I have access to business records, including certain personnel records of Petitioner related to her employment with FoUH.
5. Attached to this Affidavit as Exhibit 1 is a true and correct copy of the offer letter given to Petitioner in connection with her employment at FoUH. Sensitive information has been redacted from the letter.

6. Attached to this Affidavit as Exhibit 2 is a true and correct copy of a sample pay stub issued to Petitioner in connection with her employment at FoUH. Sensitive information has been redacted from the pay stub.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Executed this 20th day of April 2026


Robert Spodek

FILED DATE: 4/20/2026 4:24 PM 2026L001683

EXHIBIT 1

[Page withheld: personal employment record (offer letter / pay stub)]

[Page withheld: personal employment record (offer letter / pay stub)]

EXHIBIT 2

[Page withheld: personal employment record (offer letter / pay stub)]

[Page withheld: personal employment record (offer letter / pay stub)]

FILED DATE: 4/20/2026 4:24 PM 2026L001683

EXHIBIT B



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Haskell S. Garfinkel, CPA

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December 17, 2026

VIA PERSONAL DELIVERY

Mr. Eli Beer

Mr. Michael Littenberg-Brown

Settlement Communication - In re: Lisa Beth Gansberg vs. Eli Beer; and Michael Littenberg-Brown

Our firm represents Lisa Beth Gansberg ("Ms. Gansberg"), a Stage 4B cancer patient, and former employee of Friends of United Hatzalah, Inc. ("Hatzalah"). The purpose of this letter is to inform you of certain civil claims against Eli Beer ("Beer") and Michael Littenberg-Brown ("Brown") (collectively hereinafter referred to as "Defendants").

Ms. Gansberg's civil claims arise from her employment and subsequent termination from Hatzalah. Prior to her termination, Mr. Brown was aware of her illness.

[REDACTED]

[REDACTED]

[REDACTED]

FILED DATE: 4/20/2026 4:24 PM 2026L001683

EXHIBIT C

David Stein
Tel 312.456.1003
David.Stein@gtlaw.com

February 26, 2026

VIA EMAIL

The Garfinkel Group, LLC
Attn: Haskell Garfinkel
701 N. Milwaukee Ave.
Chicago, IL 60712
haskell@garfinkelgroup.com
andrew@garfinkelgroup.com

Re: Lisabeth Gansberg v. Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman; Case No. 2026 L 001683

Dear Haskell and Andrew:

As you know, Greenberg Traurig represents Friends of United Hatzalah, Inc. (“FoUH”), Eli Beer, Michael Littenberg-Brown, and Jerry Silverman. We are in receipt of the Illinois Supreme Court Rule 224 Petition that you filed on or around February 17, 2026, against FoUH, Eli Beer, Michael Littenberg-Brown, and Jerry Silverman (the “Petition”). We have also received your request that we waive service of summons as to all of the Respondents to the Petition.

We have authority to waive service on behalf of FoUH only, but not for the individual Respondents. We will return the waiver of service shortly as to FoUH only.

Putting aside the service issues, it is incumbent on us to bring to your attention that the Petition you filed is procedurally improper and facially defective. The purpose of a Rule 224 petition, as you know, is solely for taking discovery limited to the narrow issue of determining the proper defendant or defendants for a forthcoming lawsuit. This is typically done in medical malpractice or product liability matters when the defendant or defendants are truly unknown to plaintiff’s counsel. That is not the case here. In fact, the Petition pleads on its face that Ms. Gansberg was employed by FoUH. While Respondents each reserve all defenses to any lawsuit you might file, you need nothing more to file whatever lawsuit you believe is appropriate as against FoUH. Likewise, if you intend on suing the other Respondents in their individual capacities, you know who they are.

The Illinois Appellate Court recently affirmed sanctions levied against a plaintiff’s counsel for conduct similar to your filing. As the Court stated, “Rule 224 is inapplicable when the **identity of any potential defendant is already known.**” *Ingram v. Intili*, 2022 IL App (1st) 210656, ¶ 13 (emphasis added). “Once a potential defendant’s identity is learned, a petitioner can then file a

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Operates as: * A branch of Greenberg Traurig, P.A.; *Greenberg Traurig Germany, LLP; *Greenberg Traurig Limited; *A separate UK registered legal entity; *Greenberg Traurig, S.C.; *Greenberg Traurig Studio Legale Associato; *Greenberg Traurig Khalid Al-Thabity; *Greenberg Traurig Brazil Consultores em Direito Estrangeiro – Direito Estadunidense; *Greenberg Traurig LLP Foreign Legal Consultant Office; *Greenberg Traurig Singapore LLP; *A branch of Greenberg Traurig, P.A., Florida, USA; *GT Tokyo Hottetsu Jimusho and Greenberg Traurig Gakokuhomubangosai Jimusho; *Greenberg Traurig Nowakowska-Zimoch Wysokinski sp. z o.o.

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February 26, 2026

Page 2

case and use the discovery provisions of the rules or the Code to conduct full discovery of those named as respondents-in-discovery to determine who in fact was responsible.” *Id.* The face of the Petition identifies the potential defendants and is thus improper.

To the extent that you believe there is any ambiguity into who Ms. Gansberg’s employer was, she was employed by FoUH. Accordingly, you have been provided with the name of Ms. Gansberg’s employer as well. On this basis, FoUH hereby demands that you terminate the Petition to avoid unnecessary time and expense for the Parties. If you decline to do so, FoUH intends to move to terminate the Petition and seek its attorneys’ fees and costs incurred in connection with doing so. *See id.* at ¶ 17 (affirming award of sanctions after petitioner refused to terminate Rule 224 petition “after he was provided with the name of the [potential defendant] because the purpose of the rule had been satisfied.”).

Accordingly, please advise whether you will terminate the Petition on or before March 6, 2026. FoUH continues to reserve all rights and remedies.

Best Regards,



David J. Stein

cc: Naomi Beer, *via e-mail only*
Tracy Gerber, *via e-mail only*

FILED DATE: 4/20/2026 4:24 PM 2026L001683

EXHIBIT D



March 10, 2026

Via Email

David J. Stein, Esq.
Greenberg Traurig, LLP
360 North Green Street, Suite 1300
Chicago, Illinois 60607
David.Stein@gtlaw.com

Re: Case No. 2026 L 001683 - *Lisabeth Gansberg v. Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman (Settlement Communication)*

Dear David:

We write in response to your February 26, 2026 letter. At the outset, Ms. Gansberg wishes to express her sincere respect for FoUH's mission and for the extraordinary commitment of United Hatzalah's volunteers, donors, and staff worldwide. That said, your recent correspondence suggests that no meaningful investigation or corrective action has been undertaken in response to the serious concerns raised in our December 17, 2025 letter. On December 26, 2025, your colleague Tracy Gerber acknowledged receipt of our correspondence and represented that "we are reviewing your letters and will provide a more substantive response in due course," but no such substantive response has ever been provided. To date, we have received nothing addressing the allegations on the merits, documenting any internal review, or identifying any remedial steps.

Instead, counsel summarily dismissed the allegations, stating: "[s]uffice it to say that our clients disagree with and dispute all of your clients' allegations and accusations." Your February 26, 2026 letter confirms the same approach. Rather than engage with the substance of the Petition, you merely assert that Ms. Gansberg "was employed by FoUH," demand dismissal of the Rule 224 Petition, and suggest that she may "file whatever lawsuit [she] believes is appropriate as against FoUH," notably omitting any reference to the individuals against whom claims have been asserted.

Our investigation, along with your correspondence, indicates that some members of executive leadership may have used FoUH and related structures to serve their personal interests. Additionally, after our client was terminated for protected activity, these individuals are now attempting to transfer responsibility for their actions onto the organization.

I. No Claim Has Been Asserted Against FoUH

Petitioner has not asserted any claim against Friends of United Hatzalah, Inc. ("FoUH") in any complaint or petition for damages. To the contrary, Petitioner has not yet made any accusations targeting FoUH. The sole pre-suit correspondence, the December 17, 2025 letter, was addressed exclusively to Eli Beer

March 10, 2026

Page 2

and Michael Littenberg-Brown in their individual capacities. That letter asserted claims against those two individuals, not against FoUH. FoUH neither received that letter nor was its subject.

The same is true of the December 25, 2025 letter addressed to the executive members of the FoUH and United Hatzalah boards. That letter, too, confined its allegations to the conduct of Beer, Littenberg-Brown, and Silverman individually. It did not assert claims against FoUH. Rather, it called upon the boards to exercise their independent fiduciary responsibilities by investigating the individuals' conduct and implementing governance reforms. At every stage, Petitioner has deliberately distinguished between the individuals' personal misconduct and the organization. Yet despite receiving both the December 17 and December 25 letters, Respondents have never provided a substantive response on the merits.

II. The Petition Is Proper

The Petition is not a complaint. It asserts no causes of action against FoUH or anyone else. It serves a narrow purpose: to obtain limited pre-suit discovery so Petitioner can identify the proper defendants before filing suit.

The Petition does not seek discovery about parties Petitioner already knows. Instead, it seeks information necessary to identify unknown entities, undisclosed legal relationships, and issues such as whether “United Hatzalah International” or “UH International” exists as a legal entity in any jurisdiction and, if so, its legal status, governance structure, and role in U.S. operations; the capacity in which Mr. Silverman acted, whether individually, on behalf of another entity, or pursuant to what arrangement; and whether additional domestic or foreign parties may be liable in damages. Rule 224 exists to address precisely those issues.

III. *Ingram* Does Not Apply

Your reliance on *Ingram v. Intili*, 2022 IL App (1st) 210656, is misplaced. In *Ingram*, the petitioner misused Rule 224 even though the relevant defendants were already known, and counsel engaged in improper procedural conduct. That is not this case. Petitioner has not filed a complaint, has not used Rule 224 as a substitute for ordinary discovery, and has not sought discovery beyond the Rule's limited purpose. She seeks to identify unknown entities, the capacities in which known individuals acted, and undisclosed contractual and organizational relationships. *Ingram* does not bar that.

IV. The Identities of All Persons and Entities Potentially Liable in Damages Remain Unknown

Your own correspondence confirms the confusion that the Petition seeks to resolve. In Ms. Gerber's December 26, 2025 letter, Greenberg Traurig accused our office of conflating “FoUH, United Hatzalah, their leaders, board members and roles.” If the structure and lines of authority were truly as straightforward as your February 26 letter suggests, there would be nothing to conflate.

The identities of those potentially liable for damages remain unclear. Mr. Beer has identified himself both as President of FoUH and as Founder and President of several legal entities collectively known as United Hatzalah. The information currently available indicates that, while employed by FoUH and working in the United States, Mr. Beer made major operational decisions involving activities on the ground in Israel. Those responsibilities had nothing to do with fundraising efforts in the United States and were well beyond FoUH's stated mandate as registered with the IRS and the State of New York. They therefore bear directly on the

identity of all legal entities that may be responsible in damages.

Mr. Silverman also stated that United Hatzalah International either supervises or integrates Friends of United Hatzalah, and Mr. Littenberg-Brown's title changed from "Vice President of FoUH" to "Chief Executive Officer of United Hatzalah International."

Even now, FoUH's own public-facing materials continue to conflate the relevant entities rather than clarify them. A February 27, 2026 job posting for a "Director of Human Resources" identifies Friends of United Hatzalah ("FoUH") as the hiring organization, states that the role will "lead and oversee the full HR function for FoUH," and describes the position as based in FoUH's New York headquarters, yet also states that the Director of Human Resources "will report to the CEO of United Hatzalah International." In other words, FoUH publicly advertised a senior FoUH role, based in FoUH's N.Y. office and responsible for FoUH's human-resources function, while directing that employee to report to an entity, "United Hatzalah International," whose legal identity, status, and relationship to FoUH remain undisclosed. That public job posting serves to reinforce the necessity of the Petition.

Your assertion that FoUH "employed" Petitioner does not resolve those issues. Even if FoUH turns out to be one employer, that fact does not answer whether other entities also exercised employer authority, whether joint-employer principles apply, or whether the same individuals acted on behalf of FoUH, another entity, or both. Petitioner did not file the Petition to "discover" that FoUH exists. She filed it to determine the identities of all persons and entities potentially liable in damages as contemplated by Rule 224. Discovery propounded will be narrow, limited, and solely focused on the issues raised in the Petition.

V. Respondents Use FoUH as a Shield

It is Respondents, not Petitioner, who appear intent on placing FoUH squarely on the hook. Your letter insists that "she was employed by FoUH" and urges Petitioner to "file whatever lawsuit you believe is appropriate as against FoUH." At the same time, your letter advances a single narrative that channels all scrutiny, and any potential liability, toward FoUH while blocking inquiry into the conduct, authority, and capacities of other entities and the individual Respondents. FoUH should not be used as an institutional shield that prevents inquiry into their conduct.

At this point, Respondents' position appears to be that the individuals exercised the relevant authority and control, but FoUH alone should bear the legal exposure. Rule 224 does not require Petitioner to accept that premature attribution on counsel's say-so.

We note that the current management's apparent strategy, deploying a tax-exempt nonprofit organization and its resources to shield themselves from personal liability for their own alleged misconduct, raises serious questions. FoUH is a Section 501(c)(3) charitable organization. Its assets and resources, including the retention of counsel, exist to further its exempt purposes, not to insulate individual fiduciaries from the consequences of their personal conduct.

The use of organizational resources to defend individuals against claims that have been asserted against them personally, and the interposition of FoUH as a litigation shield to prevent discovery into those individuals' conduct, may itself constitute a breach of the fiduciary duties owed by FoUH's officers and directors to the organization and its charitable mission. The Board of FoUH may wish to consider whether this litigation

strategy serves the organization's interests or only those of the individuals it is being used to protect.

VI. The Sanctions Threat Lacks Merit

Your threat of sanctions is unfounded and unsupported by Illinois law. The Petitioner is following the specific process outlined by Illinois law to file against the proper parties, which is not grounds for sanctions. In contrast, it would be improper for the Respondents to force the Petitioner, under threat of sanctions, to either file a lawsuit based on statements from opposing counsel or to exclude potentially responsible parties because they cannot access crucial information that remains with the Respondents. Rule 224 was designed specifically to prevent such outcomes.

VII. The Individual Respondents May Have Acted Outside Any Legitimate Scope of Authority

In addition to the information contained in our client's correspondence of December 17, 2025, our attorneys have subsequently reviewed a substantial amount of additional evidence. Based on this review, it appears that some actions taken by the individual Respondents and other possible defendants may not have been within any proper agency capacity and may instead implicate, among other things, 18 U.S.C. §§ 1341, 1343 (mail and wire fraud); 18 U.S.C. § 1001 (false statements in matters within federal jurisdiction); 18 U.S.C. §§ 1503, 1512 (obstruction of justice, witness tampering, and evidence tampering); 18 U.S.C. § 371 (conspiracy to commit an offense against, or to defraud, the United States); 18 U.S.C. §§ 1956–1957 (money laundering); 18 U.S.C. § 1962, with terms defined in 18 U.S.C. § 1961 (RICO); 22 U.S.C. § 2778 and 22 C.F.R. Part 129 (unlawful brokering of defense articles or defense services under the Arms Export Control Act and ITAR); N.Y. Penal Law §§ 175.05, 175.10 (falsification of business records); 225 ILCS 460/9 and 225 ILCS 460/1 *et seq.* (violations of the Illinois Solicitation for Charity Act); 815 ILCS 505/2 and 815 ILCS 505/1 *et seq.* (violations of the Illinois Consumer Fraud and Deceptive Business Practices Act); and 720 ILCS 5/8-2 (conspiracy under Illinois law).

Your colleague's letter of December 26, 2025 states that Petitioner's concerns are "conclusory." They are not. The December 17, 2025 correspondence identified, among other things, donor fraud, "[v]olunteer Protection" fundraising materials, directives that staff should not mention "guns," representations that "100%" of donations were going to Israel, allegations regarding edited Zoom recordings, deleted WhatsApp messages, and the suppression or concealment of reports and communications. Prior to her termination, our client engaged in numerous instances of protected activity including repeatedly raising issues of donor fraud to the named individuals.

This issue may become highly relevant because Illinois law does not hold an employer liable for acts that fall so far outside the scope of employment or apparent agency that one cannot reasonably treat them as part of the employment relationship. *Rodman v. CSX Intermodal, Inc.*, 405 Ill. App. 3d 332, 336 (1st Dist. 2010). Illinois applies a settled three-part test: the act must be of the kind the employee was hired to perform, must occur substantially within authorized time and space limits, and must be actuated, at least in part, by a purpose to serve the employer. Conduct that is purely personal, criminal, fraudulent, retaliatory, or otherwise incapable of being understood as even an overzealous performance of assigned duties falls outside that scope. *Id.* Thus, it is entirely foreseeable that the individual Respondents' actions were so far outside any lawful agency or employment role that FoUH itself may ultimately contend their conduct cannot be attributed to it at all.

VIII. Your Firm's Inconsistent Positions Regarding Representation and Service

Your agreement to accept service only for FoUH, but not for the individual Respondents, while at the same time advancing a unified position on behalf of all Respondents, highlights the very ambiguity that necessitated the Petition. That selective posture allows Respondents to speak with one voice when it is advantageous to do so, while preserving uncertainty as to the individuals' formal status, roles, and alignment of interests.

This inconsistency has deepened over time. On December 26, 2025, Ms. Gerber's letter confirmed that Greenberg Traurig represented FoUH, Eli Beer and Michael Littenberg-Brown. Your February 26, 2026 letter now purports to also represent Jerry Silverman. Yet your letter simultaneously states that you have authority to waive service on behalf of FoUH only, but not for the individual Respondents. If Greenberg Traurig represents the individual Respondents, as both letters expressly state, and makes legal arguments on their behalf, then your firm plainly has authority to accept or waive service on their behalf. While a defendant may decline to waive service under 735 ILCS 5/2-213(e), it is difficult to reconcile your firm's assertion that it lacks *authority* to waive service for the individuals with its simultaneous exercise of authority to correspond, make legal arguments, and demand termination of the Petition on their behalf.

Petitioner should not be required to accept counsel's unified attribution of responsibility to FoUH while counsel simultaneously declines to accept service on behalf of the individuals it claims to represent. If you represent the individual Respondents in this matter, then you should accept service on their behalf. If you choose not to, please clarify the scope of your representation and whether you will be appearing for them in this proceeding.

IX. Return of Property

As it relates to your December 26, 2025 request for the return of all property, our client made multiple affirmative attempts to return FoUH property, but your client failed to take the steps necessary to effectuate that return. FoUH acknowledged that return required coordination regarding dimensions and weight and confirmed that it was "looking into a local business/vendor" to pack and retrieve the items, noting that this process could take several days, after which no action was taken. Notwithstanding Ms. Gansberg's repeated efforts and FoUH's acknowledged responsibility for arranging logistics, your December 26, 2025 letter asserts that she failed to return property while ignoring the fact that any delay resulted from FoUH's own failure to follow through on the return process it controlled. Please inform us of a date and time that a courier will be available to pick up the items, and we will ensure that they are returned promptly.

X. Conclusion

If your clients wish to discuss resolving all matters, our client is open to constructive dialogue; however, hostile responses that are ungrounded in fact and law are unhelpful and only serve to steel our client's resolve. We look forward to your response.

March 10, 2026

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FILED DATE: 4/20/2026 4:24 PM 2026L001683

Warm regards,

/s/ Haskell Garfinkel

Garfinkel Group, LLC

cc: Tracy L. Gerber, Esq., via email (gerbert@gtlaw.com)
Naomi G. Beer, Esq., via email (beern@gtlaw.com)
Jessica Golden Cortes, Esq., via email (jcortes@dglaw.com)
Ina B. Scher, Esq., via email (ischer@dglaw.com)

FILED DATE: 4/20/2026 4:24 PM 2026L001683

EXHIBIT E

David Stein
Tel 312.456.1003
David.Stein@gtlaw.com

March 26, 2026

VIA EMAIL

The Garfinkel Group, LLC
Attn: Haskell Garfinkel
701 N. Milwaukee Ave.
Chicago, IL 60712
haskell@garfinkelgroup.com
andrew@garfinkelgroup.com

Re: Lisabeth Gansberg v. Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman; Case No. 2026 L 001683

Dear Haskell and Andrew:

This correspondence is in response to your March 10, 2026 letter. Your letter does not merit a response to each and every false and improper allegation, we write to respond specifically to several misguided contentions.

First, your letter is confusing, contradictory, and put simply, legally and factually incorrect. While entirely unsubstantiated, it is nonsensical to argue that Ms. Gansberg has not, through your letter writing campaign to date, raised a potential claim against Friends of United Hatzalah, Inc. ("FoUH"). Your prior letters purported to assert potential claims under a myriad of statutes, including the Illinois Whistleblower Act, the Federal RICO statute and employment-based claims for failure to accommodate a disability, retaliation and wrongful termination, among a laundry list of others. The claims you purport to assert in those letters, the monetary amount sought and the preservation demand you made would not logically be asserted against individuals alone, including because they did not individually employ Ms. Gansberg. And the statements in your most recent March 10, 2026, letter regarding potential joint-employer liability among FoUH and other affiliated entities further serve to demonstrate how there is absolutely no basis to pretend that Ms. Gansberg is not asserting claims against FoUH.

That being said, if it is your intention to limit Ms. Gansberg's claims to ones against the individuals alone, you clearly know who those individuals are. If this is the case, there cannot be any basis for a Rule 224 Petition.

To the extent, alternatively, Ms. Gansberg *intends* to assert claims against both the individuals and an organization, there is also no need for any Rule 224 Petition for the reasons set forth in our February 26, 2026, letter: Ms. Gansberg is aware of the identity of at least one of the potential

Greenberg Traurig, LLP | Attorneys at Law

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Abu Dhabi; Albany; Amsterdam; Aspen; Atlanta; Austin; Berlin; Boston; Charlotte; Chicago; Dallas; Delaware; Denver; Dubai; Fort Lauderdale; Houston; Las Vegas; London; Long Island; Los Angeles; Mexico City; Miami; Milan; Minneapolis; Munich; New Jersey; New York; Northern Virginia; Orange County; Orlando; Philadelphia; Phoenix; Portland; Riyadh; Sacramento; Salt Lake City; San Diego; San Francisco; São Paulo; Seoul; Shanghai; Silicon Valley; Singapore; Tallahassee; Tampa; Tel Aviv; Tokyo; Warsaw; Washington, D.C.; West Palm Beach; Westchester County.

Operates as: * A branch of Greenberg Traurig, P.A.; ** Greenberg Traurig Germany, LLP; *** Greenberg Traurig Limited; A separate UK registered legal entity; **** Greenberg Traurig, S.C.; ***** Greenberg Traurig Studio Legale Associato; **** Greenberg Traurig Khalid Al-Thabity; **** Greenberg Traurig Brazil Consultores em Direito Estrangeiro - Direito Estadunidense; **** Greenberg Traurig LLP Foreign Legal Consultant Office; **** Greenberg Traurig Singapore LLP; A branch of Greenberg Traurig, P.A., Florida, USA; **** Tokyo Hottetsu Jimusho and Greenberg Traurig Gakokuhogimubangshi Jimusho; **** Greenberg Traurig Nowakowska-Zimoch Wysokinski sp.k.

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C075

March 26, 2026

Page 2

defendants – any of the three individuals – *and* she also knows the identity of at least one potential organizational defendant – her former employer, FoUH.

Even if we attempt to follow your flawed logic and assume that FoUH is not a potential defendant in any forthcoming lawsuit, your prior correspondence, including the March 10, 2026, letter, lists Mr. Beer, Mr. Littenberg-Brown, and Mr. Silverman as the target of Ms. Gansberg's claims. Therefore, as the Court in *Ingram* correctly stated, and as we already advised you in our prior letter, "Rule 224 is inapplicable [because] the **identity of any potential defendant is already known.**" *Ingram v. Intili*, 2022 IL App (1st) 210656, ¶ 13 (emphasis added). "Once a potential defendant's identity is learned, a petitioner can then file a case and use the discovery provisions of the rules or the Code to conduct full discovery of those named as respondents-in-discovery to determine who in fact was responsible." *Id.* At the risk of simply repeating our prior correspondence, **the face of the Petition identifies the potential defendants and thus your Rule 224 Petition is improper.** Regardless of whether Ms. Gansberg understands the identity of each corporate affiliate or other entity related to FoUH in some way, she can pursue whatever lawsuit she believes is appropriate against FoUH and/or the individual defendants identified in your prior correspondence, and use the discovery process to discover any additional relevant information she might want to know about other affiliate entities.

The remainder of the assertions in your March 10 letter warrant no written response. We reiterate the request that you dismiss the Rule 224 Petition, or we will be forced to move to dismiss it for all of the reasons set forth here and in our prior letter of February 26, 2026.

As to Ms. Gansberg's return of her FoUH property, there is no reason why it has taken so long for her to return it. We request that she immediately return everything to Greenberg Traurig, LLP's Chicago office, to the attention of the undersigned.

Finally, you allude to discussing settlement. If your client would like to do so, please provide a reasonable demand.

We look forward to hearing from you as soon as possible to arrange return of the company property.

Best Regards,



David J. Stein

cc: Naomi Beer, *via e-mail only*
Tracy Gerber, *via e-mail only*

FILED
4/20/2026 4:40 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
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37676604

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on April 27, 2026, at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall appear in Courtroom 2204 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602 before Judge Stephanie Saltouros or any judge that may be sitting in her stead, and present the attached **RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S COMBINED 2-619.1 MOTION TO DISMISS PETITIONER'S VERIFIED PETITION FOR DISCOVERY**, a copy of which is attached and hereby served upon you.

Dated: April 20, 2026

Respectfully submitted,

By: /s/ David J. Stein
David J. Stein
David.Stein@gtlaw.com
Kara E. Angeletti
angelettik@gtlaw.com
Greenberg Traurig, LLP
360 North Green Street, Suite 1300
Chicago, Illinois 60607
312.456.8400
Attorney No. 36511

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on April 20, 2026, the foregoing **NOTICE OF MOTION** was served via the Odyssey Illinois electronic filing system upon all counsel of record listed below.

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
haskell@garfinkelgroup.com

/s/ David J. Stein

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Gansberg
Plaintiff(s)

V.

Friends of United Hatzalah,
et al
Defendant(s)

Case No: 26-L-1683
Calendar Z Courtroom 2204

BRIEFING SCHEDULE

THIS CAUSE coming on for hearing on the motion of Plaintiff/Defendant FOUth for 269.1 to Dismiss, due notice having been given, and the court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED:

1. Movant is given leave to file his motion and memorandum in support thereof instant/within 14 days 4231 or by _____
2. Respondent shall respond by May 12, 2026 4231
3. Movant shall reply by May 26, 2026 4231
4. The movant must provide the Court at clerk's status on May 27, 2026 4217 at 9:00a.m with a COMPLETE set of courtesy copies of ALL documents including the MOTION, RESPONSE, REPLY, ETC. Deposition transcripts applicable, Complaint of Dismissal is sought: all exhibits, in accordance with the law Division Motion Judge's Rule 6.1, 6.3: 4374
5. This matter is set for Case Management on June 29 2026 at 9:00 a.m/p.m. 4619
For Ruling 4/22/26
6. No continuance of any of the above dates may result in either a striking or ruling on the motion without hearing, as applicable.
7. Lack of compliance of any of the above dates may result in either a striking or ruling on the motion without hearing, as applicable.
8. The previous hearing date of April 27, 2026 at 10:00 am/pm is stricken and reset to 20 at _____ am/pm.

9. OTHER All Respondents have been served pursuant to this Court's Ruling; Motion for alternative service denied as moot.

Judge Stephanie Salsouros-2161
APR 21 2023
MARIYANA T. SPYROPOULOS
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, ILL.

Attorney Name: David Stern / Gensberg Tarrig LLP
Attorney Number: 31511
Attorney for: Respondent FOUth
Address/City/State: 360 N Green Chicago
Telephone: 312-456-1003

Stephanie D. Salsouros

Entered: _____, Circuit Court Judge

FILED
5/8/2026 1:57 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

**RESPONDENTS ELI BEER, MICHAEL LITTENBERG-BROWN, AND JERRY
SILVERMAN’S MOTION TO QUASH SERVICE AND
MOTION TO RECONSIDER WAIVER**

Respondents Eli Beer (“Beer”), Michael Littenberg-Brown (“Brown”) (with Beer, the “Foreign Respondents”) and Jerry Silverman (“Silverman”), pursuant to 735 ILCS 5/2-301 and in response to this Court’s April 21, 2026 Order, respectfully submit their Motion to Quash Service and Motion to Reconsider Waiver (the “Motion”). In support, the Foreign Respondents and Silverman state:

INTRODUCTION

Beer is a resident of Israel, and Brown is a resident of Switzerland. Neither Beer nor Brown have been properly served as required under service standards for foreign parties. In fact, Petitioner Lisabeth Gansberg (“Petitioner”) has not even attempted service on either Foreign Respondent. Without service, this Court does not have personal jurisdiction over the Foreign Respondents, absent waiver. But neither Foreign Respondent waived service, or their objections to personal jurisdiction, under the Illinois Rules of Civil Procedure and supporting precedent. In addition, Silverman is a resident of Massachusetts. Although he will agree to waive service at this point, he too has not waived his objections to personal jurisdiction. Therefore, this Court should modify the

order deeming the Foreign Respondents served and reconsider its determination on the record that the Foreign Respondents and Silverman waived their jurisdictional objections.

BACKGROUND

On February 17, 2026, Petitioner filed a Rule 224 Petition against Friends of United Hatzalah Inc., (“FoUH”), Silverman, Beer, and Brown (the Foreign Respondents with FoUH and Silverman, “Respondents”). *See generally* Pet. Petitioner seeks pre-suit discovery, allegedly related to unidentified claims “stemming from [Petitioner’s] employment and termination[.]” Pet. at ¶ 2.

To date, Petitioner has not actually served any Respondent. Petitioner attempted to obtain a service waiver on behalf of all Respondents. However, on March 17, she filed a service waiver that was executed only on behalf of FoUH. *See* Notice & Acknowl. of Receipt of Summ. & Pet. (Mar. 17, 2026) (executed Feb. 27, 2026) (“Serv. Waiver”). Though the “To” line of the form lists all Respondents’ names, FoUH struck the names of the Foreign Respondents and Silverman. Serv. Waiver at 1. FoUH also listed only counsel for FoUH on the authority line for the individual receiving service of process. Serv. Waiver at 2. The Foreign Respondents have never completed a service waiver, nor have they informed Petitioner that they agreed to waive service. Prior to his representation in this Motion that he will agree to waive service, the same is true of Silverman.

After obtaining the FoUH service waiver, Petitioner still had not managed to serve Silverman or the Foreign Respondents. To meet this end, Petitioner filed a motion requesting alternative service for the Foreign Respondents even though she made no attempt to actually serve them through appropriate methods. *See* Pet’r’s Mot. for Issuance of Alias Summ. & Order Authorizing Alt. Serv. on Resps. Beer & Brown (Apr. 7, 2026) (the “Alternative Service Motion”). Petitioner did not file any such motion for Silverman, who is a resident of Massachusetts. In the

Alternative Service Motion, Petitioner acknowledges that Beer is a resident of Israel, and Brown is a resident of Switzerland. *See* Alt. Serv. Mot., Ex. A at ¶¶ 6-7. Petitioner noticed the Alternative Service Motion for presentment on April 27.

In the interim, on April 17, FoUH filed its appearance. *See* FoUH Appearance/Jury Demand (Apr. 17, 2026). The only litigant's name listed in the appearance is FoUH. Prior to the filing of this Motion, neither Silverman nor the Foreign Respondents filed any appearance, or any other document, with the Court. In conjunction with this Motion, the Foreign Respondents and Silverman file appearances for the first time for the sole purpose of protecting their ability to contest personal jurisdiction, as is permitted under the Illinois Rules of Civil Procedure.

As the only party with a responsive pleading deadline, FoUH filed a Motion to Dismiss the Petition on April 20. Resp. FoUH's Comb. 2-619.1 Mot. to Dismiss Pet'r's Verified Pet. for Disc. (Apr. 20, 2026) (the "Motion to Dismiss"). In all relevant places, the Motion to Dismiss specifically identified that the filing was only on behalf of FoUH – the title, the designation paragraph leading into the substantive motion, the signature block, and the certificate of service. *See* Mot. to Dismiss at 1, 9-10; *see also* Mot. to Dismiss at 6 n. 4 (stating "FoUH . . . is the only Respondent filing this Motion"). FoUH noticed the Motion to Dismiss for presentment also on April 27. Neither Silverman nor the Foreign Respondents filed any responsive pleading.

On April 21, the Court held an initial case management conference. Counsel for Petitioner and Counsel for FoUH appeared in open court. Although Respondents are all represented by the same counsel, FoUH's counsel explicitly stated on the record that he was appearing only on behalf of FoUH. *See* Ex. 1, Hearing Tr., 3:3-5 (Apr. 21, 2026). Silverman and the Foreign Respondents did not appear. As soon as appearances were entered on the record, Petitioner argued that the Foreign Respondents and Silverman had waived service based on a footnote made in FoUH's

Motion to Dismiss. Ex. 1 at 3:6-13. FoUH explained to the Court that the Motion to Dismiss was filed only on behalf of FoUH. Ex. 1 at 4:1-9. Petitioner did not identify any supporting authority for his assertion that a corporate entity can waive service on behalf of parties who have not appeared and who have been named in their individual capacity. Nonetheless, the Court read footnote 1 from FoUH's Motion to Dismiss in isolation and ruled that this statement was sufficient for the Foreign Respondents and Silverman to be deemed served and to have waived arguments as to personal jurisdiction. Ex. 1 at 4:16-24. The Court passed the matter for a briefing schedule on the Motion to Dismiss and did not hear any additional arguments on any issues. The order entered by the Court stated only that all Respondents "have been served" and did not mention personal jurisdiction more generally. *See* Ex. 2, Order (Arp. 21, 2026). The Foreign Respondents and Silverman interpret the Court's statements on the record to mean that they have also waived objections to personal jurisdiction based on the Court's statements to that effect in open Court.

Accordingly, the Foreign Respondents now move to quash service. In addition, the Foreign Respondents and Silverman respectfully request this Court reconsider its ruling that the Foreign Respondents have waived their objections to personal jurisdiction.

ARGUMENT

I. Legal Standard

Section 2-301 of the Illinois Rules of Civil Procedure permits a party to object to the court's jurisdiction by filing a motion to quash service of process. 735 ILCS 5/2-301(a). The motion may be made on its own or in a combined motion. *Id.* The motion may be supported on the papers already on file in the case. *Id.*

"Personal jurisdiction refers to the circuit court's power to exercise adjudicatory authority over particular individuals." *Pro Sapiens LLC v. Indeck Power Equip. Co.*, 2019 IL App (1st)

182019, at ¶ 70. The requirement is “based on the due process concept of allowing the defendant his day in court before entering judgment against him.” *Id.* at ¶ 74 (citation omitted). The party asserting jurisdiction has the burden to establish jurisdiction by a preponderance of the evidence. *TCA Int’l, Inc. v. B&B Custom Auto, Inc.*, 299 Ill. App. 3d 522, 529 (1st Dist. 1998) (collecting cases). In doing so, they must prove “three things: (1) proper service of process, (2) jurisdiction under the Illinois long-arm statute, and (3) due process under both the United States and Illinois Constitutions.” *Pro Sapiens*, 2019 IL App (1st) 182019 at ¶ 70 (internal quotations and citation omitted). “[A] party may object to the trial court’s personal jurisdiction at any time.” *White v. Ratcliffe*, 285 Ill. App. 3d 758, 764 (2d Dist. 1996).

The Foreign Respondents submit the Motion to Quash to challenge the service component of personal jurisdiction. By contrast, Silverman will agree to waive service following a ruling on this Motion. For clarity, service is the only personal jurisdiction element that has been before this Court. The Foreign Respondents and Silverman have not had the opportunity to address the remaining personal jurisdiction elements, nor has the Court had the opportunity to consider them. Accordingly, the Foreign Respondents and Silverman reserve their right to raise any additional arguments related to personal jurisdiction to the extent this Motion is resolved in their favor.

II. Petitioner Has Not Attempted Any Appropriate Method of Service.

Petitioner has not attempted to serve the Foreign Respondents in an appropriate manner – let alone achieved proper service. Service of process “vests jurisdiction in the court over the person whose rights are to be affected by the litigation.” *Performance Network Sols, Inc. v. Cyberklix US, Inc.*, 2012 IL App (1st) 110137, at ¶ 44 (citation omitted). Proper service is a “prerequisite” for personal jurisdiction, even where the party has notice of the proceedings. *White*, 285 Ill. App. 3d at 763-64 (citing *State Bank v. Thill*, 113 Ill. 2d 294, 308-09 (1986)); *see also Pro*, 2019 IL App

(1st) 182019 at ¶ 77 (“[M]ere knowledge of a lawsuit or an antagonistic motion is no substitute for service of process.”).

Beer and Brown live in Israel and Switzerland, respectively. Both countries are participants in the Hague Service Convention. *See* 1969 U.S.T. LEXIS 152, at *33 (reflecting Israel signature), *34 (reflecting Switzerland signature). Accordingly, the Hague Service Convention “governs formal service of process” for the Foreign Respondents. *See White*, 285 Ill. App. 3d at 765. The Hague Service Convention was drafted “for the purpose of creating an appropriate means ‘to ensure that judicial and extrajudicial documents to be served abroad shall be brought to the notice of the addressee in sufficient time.’” *Id.* It applies to “all cases, in civil or commercial matters, where there is occasion to transmit a judicial or extrajudicial document for service abroad.” *Id.* (internal quotations and citation omitted). Importantly, the Hague Service Convention applies to service of process in Illinois state court and “preempts any inconsistent methods of service permitted by Illinois law.” *Id.* (citing *Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 699 (1988)).

The Hague Service Convention includes detailed procedures for accomplishing international service. *Id.* Petitioner did not endeavor to use any of those procedures. In fact, Petitioner seemingly has made no service attempts on the Foreign Respondents – Hague-compliant or otherwise. *See generally* Alt. Serv. Mot. Accordingly, the Foreign Respondents have not been served in accordance with personal jurisdiction requirements.

III. The Foreign Respondents and Silverman Request this Court Reconsider Its Ruling on Waiver.

Even if a component of personal jurisdiction is missing, a party can waive its objections to personal jurisdiction. During the initial case management conference, this Court ruled that the Foreign Respondents and Silverman had done so. The Foreign Respondents and Silverman

respectfully request that this Court reconsider its April 21, 2026 ruling that deemed them to have waived these objections. “The purpose of a motion to reconsider is to alert the court of newly discovered evidence that was unavailable at the time of the hearing, changes in the law, or errors in the court’s application of the law.” *Belluomini v. Zaryczny*, 2014 IL App (1st) 122664, at ¶ 20 (affirming grant of motion to reconsider based on application of law) (citing *Duresa v. Commonwealth Edison Co.*, 348 Ill. App. 3d 90, 97 (2004)).

The Court’s waiver ruling appears to rely exclusively on Petitioner’s position that a footnote in a brief filed by a *different* party amounts to waiver. *See* Ex. 1 at 4:16-20. During the hearing, this Court did not have the benefit of meaningful argument, supported by authority on waiver, regarding Petitioner’s one-sentence oral argument. Accordingly, the Foreign Respondents and Silverman believe it is appropriate to bring to this Court’s attention personal jurisdiction waiver law as applied to this instance.

A. The Plain Language of Section 2-301 Supports Reconsideration.

Section 2-301 governs a party’s objections to personal jurisdiction. *See* 735 ILCS 5/2-301. Although Section 2-301 used to consider broad strokes in assessing waiver, the statute has since been amended to reflect “a legislative intent to narrow the waiver rule that existed under prior law.” *KSAC Corp. v. Recycle Free, Inc.*, 364 Ill. App. 3d 593, 597 (2d Dist. 2006). Accordingly, this section “now contains an explicit waiver provision” that rejects the previous rule that waiver may occur based on a general appearance. *See, e.g., OneWest Bank, FSB v. Topor*, 2013 IL App (1st) 120010, at ¶ 11 (citation omitted). The amended language states:

A party filing any other pleading or motion prior to the filing of a motion objecting to the court’s jurisdiction over the party’s person as set forth in subsection (a)

waives all objections to the court's jurisdiction over the party's person prospectively[.]¹

735 ILCS 5/2-301(a-6); *see also BAC Home Loans Serv., LP v. Mitchell*, 2014 IL 116311, at ¶ 34 (confirming “waiver of objections to personal jurisdiction is comprehensive when a party submits to the court's jurisdiction *by filing a responsive pleading or motion*”) (emphasis added).

The statute expressly notes the filing constituting waiver must be done by the party with the jurisdictional objection. *See* 735 ILCS 5/2-301(a-6). Prior to this Motion, which specifically objects to personal jurisdiction under Section 2-301, the Foreign Respondents and Silverman had never filed *anything* in this case – let alone a pleading or motion that would constitute waiver under the statute. The docket confirms that FoUH is the only Respondent that has filed any documents in this case. *See* FoUH Appearance/Jury Demand; Mot. to Dismiss.

Try as she might, Petitioner cannot impose FoUH's Motion to Dismiss on the Foreign Respondents and Silverman. Though Petitioner alleges that all three individuals are either officers of FoUH or in a contractual relationship with FoUH, *see* Pet. at ¶¶ 14 (as to Beer), 18 (as to Brown), 24 (as to Silverman)—the company remains a distinct legal entity from the individually named Respondents. *E.g., Pro Sapiens*, 2019 IL App (1st) 182019, at ¶¶ 77-93. “A corporation is a legal entity that exists separate and distinct from its shareholders and officers, even if the corporation consists of only one or two shareholders.” *Id.* at ¶ 62 (collecting cases). “[I]t makes no difference whether [the individual] is the sole shareholder or a mere employee” of a co-defendant corporate entity. *Id.* at ¶ 79. Legal actions of the corporate entity are *not* considered actions of the individual. *See John Isfan Constr. v. Longwood Towers, LLC*, 2016 IL App (1st) 143211, at ¶ 41 (rejecting argument that service had been waived, reinforcing distinctions between corporate entities and

¹ This section includes certain exceptions, which are not at issue in this case. *See id.* at 5/2-301(s-6)(1-2).

related individuals). To hold otherwise would denigrate the protection of employee rights. *Id.* at ¶ 85 (emphasizing importance of such in “giving that employee proper service of process”). This same principle also extends to court appearances, where there is no indication that there was an appearance on the individual’s behalf. *Id.* at ¶ 93.

Every submission by a Respondent in this matter has been on behalf of only FoUH. FoUH Appearance/Jury Demand; Mot. to Dismiss. Every appearance in this matter has been on behalf of only FoUH. *See* FoUH Appearance/Jury Demand; Ex. 1 at 3:3-5. The Foreign Respondents’ employment status, and Silverman’s contractual relationship, with FoUH do not change these facts. *See Pro Sapiens*, 2019 IL App (1st) 182019 at ¶ 77-93 (vacating order as applied to individual, rejecting notion that owner/employee waived objection to personal jurisdiction through participation in discovery for company). Thus, under the plain language of Section 2-301, the Foreign Respondents and Silverman never filed any “pleading or motion” that would constitute waiver of their personal jurisdiction objections.

B. Case Law Regarding the Impact of the Footnote Supports Reconsideration.

In addition to the fact that the footnote was not filed by the Foreign Respondents and Silverman, it also cannot substantively impact the waiver analysis. A party cannot be said to waive personal jurisdiction where the statement at issue merely points out a step that the court is entitled to take on its own – with or without a submission by the party objecting to jurisdiction. *People v. Maiden*, 2013 IL App. (2d) 120016, at ¶ 27.

In *Maiden*, a criminally convicted petitioner filed a petition for relief from judgment and asserted that he had served the State. *Id.* at ¶4. The State informed the court that it never received a copy of the petition. *Id.* Following this exchange, the State advised the court that the court could *sua sponte* dismiss the petition based on a cited case addressing petitions for relief from judgment. *Id.* at ¶ 5. The lower court accepted the State’s direction under its cited case and dismissed the

petition on the merits. *Id.* The petitioner appealed the dismissal on the basis that no judgment can stand when service is contested. *Id.* at ¶17. The State argued that its decision to direct the court to the supporting case amounted to a service waiver, and thus the dismissal should stand. *Id.*

Reversing the lower court, the appellate court held that the State had *not* waived service by directing the court to an action that the court was entitled to take on its own. *Id.* at ¶ 27. The court likened the State’s conduct to that of a general appearance that did not waive jurisdictional objections. *Id.* at ¶¶ 23-27. Because the State’s statement simply pointed out a step the court could have taken without the State filing a motion to dismiss, the dismissal was premature based on contested service. *Id.* at ¶ 27 (“[T]he State argued that the trial court could *sua sponte* dismiss the action under *Vincent*, an action that *by its nature does not involve a motion to dismiss by the State.*”).

Like the case citation in *Maiden*, the footnote here simply advised the Court of actions it was entitled to take if the Court granted FoUH’s Motion to Dismiss. In referencing dismissal as to all parties, FoUH stated a procedural reality if the Court were to accept FoUH’s arguments. First, if Petitioner does already know of a single potential defendant, the Petition must be dismissed in its entirety – regardless of the number of Respondents named or which of them sought dismissal. *See* Mot. to Dismiss at II. Second, if Petitioner failed to plead the Petition within Section 2-615 pleading standards, the Petition likewise must be dismissed in its entirety – despite the fact that the Foreign Respondents and Silverman had not filed their own responsive pleadings. *See* Mot. to Dismiss at III.

The statement in the footnote remains true, regardless of whether the Foreign Respondents and Silverman *had* filed their own responsive pleadings—which they did not do. *See supra*, at III.A. FoUH highlights this exact point in the second footnote in the Motion to Dismiss. Mot. to

Dismiss at 6 n. 4 (“As of the filing of this Motion, FoUH was the only Respondent who had been served and thus is the only Respondent filing this Motion. However, dismissal with prejudice as to all Respondents is still proper because of this fatal flaw in the Petition.”). Because the Court would be entitled to take the very action raised in the footnote *without* an independent motion to dismiss filed by the Foreign Respondents or Silverman, the footnote cannot serve as a basis to waive personal jurisdiction objections of Respondents who reside either on the other side of the country, or on the other side of the world, and who have not filed their own pleading or motion.

CONCLUSION

The Foreign Respondents respectfully request that this Court quash service as to each of them. Petitioner has not engaged in any appropriate service attempts for Respondents who live in Israel and Switzerland. In this instance, personal jurisdiction is only appropriate if the Foreign Respondents and Silverman waived their objections to personal jurisdiction under Section 2-301 by filing a pleading or motion before objecting to jurisdiction. This Motion, contesting personal jurisdiction, is the Foreign Respondents’ first filing of any kind. FoUH’s Motion to Dismiss cannot substitute as a pleading or motion on behalf of the Foreign Respondents or Silverman. Nor does the footnote itself provide a legitimate basis, under the statute, to waive personal jurisdiction. The Foreign Respondents and Silverman ask that this Court reconsider its ruling regarding waiver and provide them an opportunity to contest personal jurisdiction in the ordinary course of this case.

WHEREFORE, the Foreign Respondents and Silverman respectfully request that this Court grant this Motion, quash service as to the Foreign Respondents, modify the Court’s April 21, 2026 order to reflect that the Foreign Respondents have not been served, enter an order confirming that the Foreign Respondents and Silverman have not waived their objections to personal jurisdiction, and grant any other relief this Court deems equitable and just.

Dated: May 8, 2026

Respectfully submitted,

**ELI BEER, MICHAEL LITTENBERG-BROWN
and JERRY SILVERMAN**

By: /s/ David J. Stein

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Attorneys for Foreign Respondents

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on May 8, 2026, the foregoing **RESPONDENTS ELI BEER, MICHAEL LITTENBERG-BROWN, AND JERRY SILVERMAN'S MOTION TO QUASH SERVICE AND MOTION TO RECONSIDER WAIVER** was served via the Odyssey Illinois electronic filing system upon all counsel of record listed below.

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
haskell@garfinkelgroup.com

/s/ David J. Stein

FILED DATE: 5/8/2026 1:57 PM 2026L001683

EXHIBIT 1

1 STATE OF ILLINOIS)
2) SS:
3 COUNTY OF C O O K)
4 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
5 COUNTY DEPARTMENT - LAW DIVISION
6 LISABETH GANSBERG,)
7 Petitioner,)
8 vs.) Case No. 2026L001683
9 FRIENDS OF UNITED HATZALAH,)
10 INC., ELI BEER, MICHAEL)
11 LITTENBERG-BROWN, and JERRY)
12 SILVERMAN,)
13 Respondents.)
14 REPORT OF PROCEEDINGS at the hearing
15 of the above-entitled cause before the Honorable
16 STEPHANIE D. SALTOUROS, Judge of said Court, on the
17 21st day of April, 2026 at the hour of 9:46 a.m.
18
19
20
21
22
23 Reported by: GINA M. LUORDO, CSR, RPR, CRR
24 License No.: 084-004143

1 APPEARANCES:

2 THE GARFINKEL GROUP, LLC

3 BY: MR. HASKELL S. GARFINKEL

4 701 North Milwaukee Avenue, Suite 1

5 Chicago, Illinois 60642

6 (312) 736-7991

7 haskell@garfinkelgroup.com

8 Representing the Petitioner;

9
10 GREENBERG TRAURIG

11 BY: MR. DAVID H. STEIN

12 360 North Green Street, Suite 1300

13 Chicago, Illinois 60606

14 (312) 456-8400

15 steind@gtlaw.com

16 Representing the Respondent.

17
18 * * * * *

1 MR. GARFINKEL: Good morning, your Honor.
2 Haskell Garfinkel for the petitioner.

3 MR. STEIN: Good morning, your Honor. David
4 Stein on behalf of the respondent, Friends of
5 United Hatzalah.

6 MR. GARFINKEL: Your Honor, we're here on the
7 CMC. FOUH has been served, and we had also
8 piggybacked the motion for alternative service.
9 However, in the interim, FUOH has filed a motion to
10 dismiss. In that motion to dismiss, they made
11 arguments on behalf of the individuals who had
12 previously refused to waive service, so we believe
13 there's a general appearance on file.

14 THE COURT: Okay. Explain to me why this isn't
15 a respondent in discovery issue, how this is a
16 petition.

17 MR. GARFINKEL: Because all we're looking for
18 here, your Honor, is who the legal entity is that
19 our client worked for with three interrogatories or
20 so.

21 MR. STEIN: Your Honor, we have a motion to
22 dismiss. We think that we should brief it and come
23 back. He wants -- he's got another motion on file.
24 It's just a --

1 THE COURT: It's your motion to dismiss? You
2 put all of the individuals in there who have not
3 been served?

4 MR. STEIN: No. We only appeared on behalf of
5 the entity.

6 THE COURT: Yeah, but is your motion to dismiss
7 filed on behalf of all the individual people?

8 MR. STEIN: No. It's only filed on behalf of
9 the entity.

10 MR. GARFINKEL: Your Honor, if you look at the
11 footnote on the bottom of the first page.

12 MR. STEIN: The arguments apply equally.

13 THE COURT: Hold on.

14 MR. GARFINKEL: They don't get to have it both
15 ways, your Honor.

16 THE COURT: Hold on. The arguments apply
17 equally? You waived jurisdiction by adding your
18 little footnote. So pass it for briefing schedule
19 on all. You shouldn't have put them in there, but
20 you did.

21 MR. GARFINKEL: So all defendants have now been
22 served, your Honor.

23 THE COURT: All defendants have now been
24 served. He placed them all in the motion. He

1 literally asked that the case be dismissed with
2 regards to all of them.

3 MR. GARFINKEL: Your Honor, in addition, they
4 also filed -- they also cited numerous unpublished
5 decisions in their motion to dismiss. I could file
6 motions to strike those. I can file a separate
7 motion to strike. And they filed documents with
8 one paragraph and 15 pages of redaction without
9 complying with General Order 7(b).

10 MR. STEIN: Are we going to brief the motion?

11 THE COURT: Just pass it and brief the motion.
12 You can put that in your response.

13 (Which were all the
14 proceedings had in the
15 above-entitled case this date
16 and time.)
17
18
19
20
21
22
23
24

1 STATE OF ILLINOIS)
2) SS:
3 COUNTY OF C O O K)
4

5 Gina M. Luordo, being first duly
6 sworn, on oath says that she is a court reporter
7 doing business in the City of Chicago; and that
8 she reported in shorthand the proceedings of said
9 hearing, and that the foregoing is a true and
10 correct transcript of her shorthand notes so taken
11 as aforesaid, and contains the proceedings given
12 at said hearing.

13 
14

15 GINA M. LUORDO, CSR, RPR, CRR
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EXHIBIT 2

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Gansberg)
Plaintiff(s))
V.)
Friends of United Hatzalah,)
et al)
Defendant(s))

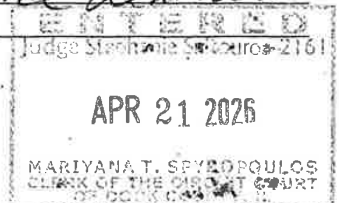
Case No: 26-L-1683
Calendar Z Courtroom 2204

BRIEFING SCHEDULE

THIS CAUSE coming on for hearing on the motion of Plaintiff/Defendant FOUR for 2-69.1 to Dismiss, due notice having been given, and the court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED:

1. Movant is given leave to file his motion and memorandum in support thereof instant/within 14 days 4231 or by _____.
2. Respondent shall respond by May 12, 2026 4231
3. Movant shall reply by May 26, 2026 4231
4. The movant must provide the Court at clerk's status on May 27, 2026 4217
at 9:00a.m with a **COMPLETE** set of courtesy copies of ALL documents including the MOTION, 4374
RESPONSE, REPLY, ETC. Deposition transcripts applicable, Complaint of Dismissal is sought:
all exhibits, in accordance with the law Division Motion Judge's Rule 6.1, 6.3:
5. This matter is set for Case Management on June 19 2026 at 9:00 a.m/p.m 4619
For Ruling
6. No continuance of any of the above dates may result in either a striking or ruling on the motion without hearing, as applicable.
7. Lack of compliance of any of the above dates may result in either a striking or ruling on the motion without hearing, as applicable.
8. The previous hearing date of April 27, 2026 at 10:00 am/pm is stricken and reset to 20 at am/pm.
9. OTHER All Respondents have been served pursuant to the Court's Ruling; Motion for alternative service denied as moot.



Attorney Name: David Stern / Gregory Tarrig LLP
Attorney Number: 36511
Attorney for: Respondent FOUR
Address/City/State: 360 N Green Chicago
Telephone: 312-456-1003 Entered: _____

_____, Circuit Court Judge

FILED DATE: 5/8/2026 1:57 PM 2026L001683

Appearance/Jury Demand

(12/01/24) CCL 0530

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

LISABETH GANSBERG

Plaintiff

Case No. 2026 L 001683

v.

Calendar: Z

FRIENDS OF UNITED HATZALAH, INC.,
ELI BEER, MICHAEL LITTENBERG-BROWN, and
JERRY SILVERMAN

Defendant

APPEARANCE/JURY DEMAND

☒ General Appearance

☒ 0900 - Appearance - Fee Paid

☐ 0909 - Appearance- No Fee

☐ 0904 - Appearance Filed - Fee Waived

☐ Jury Demand

☐ 1900 - Appearance & Jury Demand - Fee Paid

☐ 1909 - Appearance & Jury Demand - No Fee

The undersigned enters the appearance of: ☐ Plaintiff ☐ Defendant

☐ Additional Party

☒ Respondent-in-discovery

ELI BEER, MICHAEL LITTENBERG-BROWN and JERRY SILVERMAN

Litigant's Name

/s/ David J. Stein

Signature

☒ INITIAL COUNSEL OF RECORD

☐ PRO SE

☐ ADDITIONAL APPEARANCE

☐ SUBSTITUTE APPEARANCE

A copy of this appearance shall be given to all parties who have appeared and have not been found by the Court to be in default.

Mariyana T. Spyropoulos, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

☒ **Atty. No.:** 36511 ☐ **Pro Se** 99500

Name: David J. Stein | Greenberg Traurig, LLP

Atty. for (if applicable):

Respondent | Friends of United Hatzaleh, Inc.

Address: 360 North Green Street, Suite 1300

City: Chicago

State: IL **Zip:** 60607

Telephone: (312) 456-1003

Primary Email: David.Stein@gtlaw.com

Pro Se Only:

☐ **I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:**

FILED DATE: 5/8/2026 1:57 PM 2026L001683

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5/8/2026 2:07 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

**RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S
COMBINED 2-619.1 AMENDED MOTION TO DISMISS
PETITIONER'S VERIFIED PETITION FOR DISCOVERY**

Respondent Friends of United Hatzalah, Inc. ("FoUH"), pursuant to 735 ILCS 5/2-619.1 and Illinois Supreme Court Rule 224, submits its Combined 2-619.1 Amended Motion to Dismiss Petitioner Lisabeth Gansberg's ("Petitioner") Verified Petition for Discovery Pursuant to Illinois Supreme Court Rule 224 (the "Petition").¹ In support, FoUH states:

INTRODUCTION

Petitioner knowingly filed a faulty Petition that, on its face, identifies potential defendants for her purported employment-related claims. The Petition also falls woefully below Petitioner's burden to plead a viable cause of action sufficient to justify her need for pre-suit discovery. Accordingly, this Court should dismiss the Petition with prejudice.

¹ Petitioner filed her Petition against FoUH and three individuals (Eli Beer, Michel Littenberg-Brown and Jerry Silverman (collectively "the Individual Respondents")). The Individual Respondents have not been served. However, the arguments made by FoUH in this Motion apply equally to the Individual Respondents, and the Petition should be dismissed with prejudice as to all four Respondents.

BACKGROUND

Petitioner was employed as a Midwest Regional Director at FoUH from approximately August 2023 through November 2025. There can be no dispute that Petitioner knows that FoUH was her employer. She has known her employer's identity at least since July 24, 2023, when she accepted FoUH's offer of employment. Ex. A, R. Spodek Affidavit at Ex. 1 (Offer Letter). Petitioner's final pay record also confirms this fact. Ex. A, Spodek Aff. at Ex. 2 (Sample Pay Stub).

Despite this knowledge, on February 17, 2026, Petitioner filed a Rule 224 Petition against FoUH and the Individual Respondents (collectively "Respondents"), seeking pre-suit discovery from the four Respondents in order to identify potential defendants for her alleged forthcoming lawsuit. Pet., ¶ 1 (Feb. 17, 2026). The Petition does not include any specific factual or legal allegations for the claim(s) that Petitioner plans to file. *See generally* Pet. Instead, Petitioner vaguely references that she may seek relief for "violations of Illinois law stemming from the employment and termination of Petitioner by her employer(s), in violation of numerous Illinois laws including but not limited to violations of the Illinois Human Rights Act [(the "IHRA")] . . . and the Illinois Wage Payment and Collection Act [(the "IWPCA").]" Pet. at ¶ 2.

The Petition identifies FoUH as Petitioner's employer. Pet. at ¶ 9. It also appears to implicate the Individual Respondents as decisionmakers of her employer. *See* Pet. at ¶¶ 14-16, 18, 20-21, 24. Notwithstanding that Petitioner has already identified her employer and potential individual defendants against whom she asserts she may have a claim, *see* Ex. A; *see also* Pet. at ¶¶ 9, 22, 40—Petitioner still opted to file the Petition.

After receiving the Petition, Respondents contacted Petitioner to remind her, once again, that FoUH was her employer. *See* Ex. B, Feb. 26, 2026 Letter at 2 ("To the extent that you believe there is any ambiguity into who Ms. Gansberg's employer was, she was employed by FoUH.").

Because Petitioner has always known who her employer was – and also knows the identity of the Individual Respondents that Petitioner has asserted may also bear liability – Respondents requested that Petitioner dismiss the Petition to avoid the necessity of this Motion and the Court’s time and resources. Petitioner declined, claiming, among other things, that pre-suit discovery was necessary to identify whether “other entities also exercised employer authority.” Ex. C, Mar. 10, 2026 Letter. Respondents followed up again, reminding Petitioner that because she knows the identity of at least one potential defendant, her conduct in filing a defective Rule 224 Petition could be cause for an award of attorneys’ fees. Ex. D, Mar. 26, 2026 Letter.

ARGUMENT

I. Legal Standard.

Illinois Supreme Court Rule 224 allows a plaintiff to institute a request for pre-suit discovery “for the sole purpose of ascertaining the identity of one who may be responsible in damages[.]” A Rule 224 petition is subject to the same standards of dismissal as a complaint, including under 735 ILCS 5/2-615 and 735 ILCS 5/2-619. *See Stone v. Paddock Publs., Inc.*, 2011 IL App (1st) 093386, at ¶ 18 (discussing section 2-615 standard for Rule 224 petitions); *Medlock v. Plains All Am. Pipeline, L.P.*, 2016 IL App (5th) 160034-U, at ¶ 1 (discussing section 2-619 standard for Rule 224 petitions). A section 2-615 motion challenges the legal sufficiency of the complaint based on the face of the pleading. *Goldwater v. Greenberg*, 2017 IL App (1st) 163003, at ¶ 9. A section 2-619 motion challenges the pleading on other affirmative matters, including bases outside of the complaint that the court may consider. *Medlock*, 2016 IL App (5th) 160034-U at ¶ 21.

II. Under Section 2-619, the Petition Confirms Rule 224 Discovery Is Not Necessary.

Petitioner has already identified, in the Petition, potential defendants in her alleged employment-related action – including her employer, FoUH. “A Rule 224 petition allows discovery of the identity of a potential defendant whose identity is not already known. . . . Once the identity of such a person or entity has been ascertained, the purpose of Rule 224 has been achieved and the action should be dismissed.” *Low Cost Movers, Inc. v. Craigslist, Inc.*, 2015 IL App (1st) 143955, at ¶ 12 (internal citations and quotations omitted), ¶ 13 (collecting cases holding same). Consequently, after a petitioner under Rule 224 knows of a single potential defendant that is connected to the alleged injury, further discovery under Rule 224 is precluded. *Id.* at ¶ 16 (affirming dismissal of Rule 224 petition where petitioner learned that respondent committed act for which petitioner aimed to seek liability).

A petitioner is not entitled to Rule 224 discovery in order to identify *additional* potential defendants. *Id.* at ¶¶ 9, 16. This remains true even if the known defendant does not comport with the petitioner’s intended theories of liability. *Id.* at ¶¶ 9, 17. To this end, a Rule 224 petition is “invalid from the outset” if the petitioner already knows the identity of at least one potential defendant when filing the petition. *Ingram v. Intili*, 2022 IL App (1st) 210656, at ¶ 16 (affirming petition dismissal where petitioner knew of at least two defendants).

Here, although Petitioner has not specifically identified her claims, she has alleged that her eventual complaint “relates to violations of Illinois law stemming from the employment and termination of Petitioner by her employer(s)[.]” Pet. at ¶ 2; *id.* at ¶ 47 (describing claims as “arising from [Petitioner’s] employment, supervision, compensation and termination under Illinois law”). Petitioner knew who her employer was while she was employed (and even before her employment

started, when she signed her offer letter). *See* Ex. A.² Petitioner admits as much in the Petition, which alleges she worked for FoUH. Pet. at ¶ 9. And, after she filed the Petition, she was once again reminded that FoUH was her employer, when FoUH requested that she dismiss the Petition for this very reason. Exs. B, D. FoUH acknowledges, as it always has, that it is Petitioner’s employer. Petitioner also already knows the identities of the Individual Respondents against whom she purportedly has claims. *See* Pet. at ¶¶ 14-16, 18-21, 22-23, 26, 40; *see also* Ex. C (identifying Individual Respondents by name and implying liability). Petitioner’s alleged confusion as to the nature of Respondents’ legal representation, Pet. at ¶¶ 39-45 – as well as her references to distinct international organizations and speculation as to the Individual Respondents’ roles within those organizations, Pet. at ¶¶ 28-33, 47 – do not change these facts.

The Petition confirms that the nature of the discovery that Petitioner seeks is not necessary. First, Petitioner seeks the identity of her employer, a question to which she has long had the answer. *See* Pet. at ¶ 51(a). Likewise, Petitioner also seeks discovery that goes to whether Respondents would be *liable*, not who they actually are. *See* Pet. at ¶ 51(b, d) (seeking discovery sufficient to identify whether Individual Respondents were acting in their individual capacities and the “contractual relationships” governing Respondents’ supervisory authority); *see also* Pet. at ¶¶ 20-21, 26-27 (alleging “confusion” as to whether Brown and/or Silverman should be liable). In defending the Petition, Petitioner even admitted that both her theory of liability and the purpose of her Petition is based in part on her allegation that individuals may have acted outside their scope of employment and “us[ed] FoUH as a shield.” Ex. C at 3. Again, Rule 224 only permits discovery into defendants’ identities; it does not permit discovery into theories of liability as to those

² This Court may consider the exhibits in ruling on a Section 2-619 motion to dismiss a Rule 224 petition. *See Medlock*, 2016 IL App (5th) 160034-U at ¶¶ 23 (affirming dismissal of petition under section 2-619 and confirming court could rely on attachments containing “easily proved issues of fact” attached to the motion).

defendants. *Ingram*, 2022 IL App (1st) 210656 at ¶ 9, 17. Petitioner further acknowledged in her March 10th letter that the Petition seeks information as to “[a]ll [p]ersons and [e]ntities [p]otentially [l]iable in [d]amages.” *See* Ex. C at 2; *see also* Pet. at ¶ 51(c). But Rule 224 is not the appropriate vehicle to achieve this goal. *See, e.g., Ingram*, 2022 IL App (1st) 210656 at ¶¶ 9, 16.

At bottom, the Petition serves no purpose because Petitioner already knows the identities of not just one, but *four* potential defendants for her employment-related claims. Because the Petition is “frivolous and inapplicable,” and has been from the start, this Court should dismiss the petition with prejudice.³ *See id.* at ¶ 16 (affirming Rule 137 sanctions against petitioner who pursued petition after identifying potential defendant and sought discovery beyond names, which “exceeded the scope” Rule 224).

III. Under Section 2-615, Petitioner Did Not Meet Her Pleading Burden.

Even if Petitioner did not know of a single potential defendant, the Petition does not contain allegations that would support any cause of action. A Rule 224 petition is required to include “allegations sufficient to overcome a section 2-615 motion to dismiss.” *Stone*, 2011 IL App (1st) 093386 at ¶ 18. “[I]f a petitioner cannot satisfy the section 2-615 standard, it is clear that the unidentified individual is not responsible for damages and the proposed discovery is not ‘necessary.’” *Id.* (citation omitted). This standard balances the rights of both the petitioner seeking pre-suit discovery and the unidentified individual(s) or entity(ies). *Id.* Notably, the burden is on the petitioner to “show that the discovery is necessary, *i.e.*, that petitioner can allege facts supporting a cause of action.” *Id.* The Petition falls well below this standard.

³ As of the filing of this Motion, FoUH was the only Respondent who had been served and thus is the only Respondent filing this Motion. However, dismissal with prejudice as to all Respondents is still proper because of this fatal flaw in the Petition.

First, Petitioner has failed to identify any specific cause of action for which she purportedly needs to identify a defendant. *See generally* Pet. Petitioner admits as much in her March 10th letter. Ex. C at 2 (noting Petition “asserts no causes of action against FoUH or anyone else”). Second, even if this Court were to consider the vague references to “Illinois law,” the IHRA, and the IWPCA, Petitioner does not specify what the alleged violations actually are. *See* Pet. at ¶ 2. Third, regardless of whether the Petition contains any enumerated cause of action, Petitioner did not allege *any* meaningful facts to support a lawsuit. *See generally* Pet. This failure in particular has made it impossible to discern what the alleged violations related to Petitioner’s employment even *could* be – under either the referenced statutes or any other legal theory. Because the Petition cannot survive a section 2-615 motion, this Court should dismiss the Petition.

IV. Petitioner’s Conduct Should be Sanctioned.

Petitioner filed a faulty Petition from the outset, which warrants sanctions against Petitioner in the form of FoUH’s attorneys’ fees to oppose the Petition. Under Illinois Supreme Court Rule 137, this Court may impose sanctions for a pleading, like a Rule 224 petition, that does not reasonably comport with facts or existing law. Ill. Sup. Ct. R. 137(a); *see also Ingram*, 2022 IL App (1st) 210656 at ¶¶ 16, 19. Courts have held that sanctions are appropriate where a plaintiff knows the identity of at least one defendant but still decides to file and pursue a Rule 224 petition. *Id.* at ¶ 16 (affirming sanctions for faulty Rule 224 petition where petitioner knew at least one potential defendant’s identity). This is especially true where the respondent from which discovery is sought confirms for the petitioner the identity of the potential defendant. *Id.* at ¶ 17 (criticizing petitioner for not terminating petition once he was provided with additional requested name). Sanctions are likewise appropriate where the petition seeks discovery that goes beyond the purpose

of the Rule. *Id.* (criticizing petitioner for seeking pre-suit discovery that pertained to theory of liability, as opposed to identity).

Petitioner has known all along that FoUH was her employer. Before filing the Petition, Petitioner has also known the identities of the Individual Respondents, against whom she indicates she has claims. Even if she thinks there may be other potential defendants, this is more than enough information for Petitioner to file her employment-related claims. Yet she filed the Petition anyway. Since then, she has been reminded at least twice that FoUH was her employer, when FoUH requested that she dismiss the Petition. She has declined to do so. In her refusal, Petitioner also stands by inappropriate requests for discovery that extend well beyond the scope of the Rule. *See supra*, at II. These overbroad requests confirm that Petitioner initiated a harassing proceeding to obtain information that is already – and always has been – in her possession. Accordingly, Petitioner should be required to pay for FoUH’s attorneys’ fees in responding to this frivolous Petition.

CONCLUSION

Petitioner is not entitled to pre-suit discovery. From the beginning, Petitioner has been aware of the identities of potential defendants, rendering her Petition frivolous. To make matters worse, she has not even attempted to plead facts that would support a legitimate cause of action that could justify the need for discovery. Accordingly, this Court should dismiss the Petition with prejudice and grant FoUH attorneys’ fees for being forced to respond.

WHEREFORE, FoUH respectfully requests this Court grant its Amended Motion to Dismiss, dismiss the Petition with prejudice, award FoUH its attorneys’ fees incurred in opposing the Petition, and grant any other relief this Court deems equitable and just.

Dated: May 8, 2026

Respectfully submitted,

FRIENDS OF UNITED HATZALAH, INC.

By: /s/ David J. Stein

David J. Stein
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Attorney Code No. 36511

Attorneys for Respondent

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on May 8, 2026, the foregoing **RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S COMBINED 2-619.1 AMENDED MOTION TO DISMISS PETITIONER'S VERIFIED PETITION FOR DISCOVERY** was served via the Odyssey Illinois electronic filing system upon all counsel of record listed below.

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
haskell@garfinkelgroup.com

/s/ David J. Stein

FILED DATE: 5/8/2026 2:07 PM 2026L001683

EXHIBIT A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

AFFIDAVIT OF ROBERT SPODEK

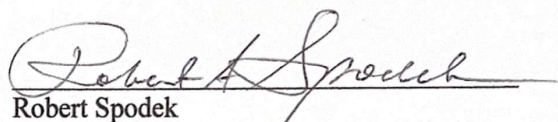
I, Robert Spodek, pursuant to 735 ILCS 5/1-109, hereby declare as follows:

1. I am the Chief Financial Officer at Friends of United Hatzalah, Inc. ("FoUH").
2. I make this Affidavit in support of FoUH's Combined 2-619.1 Motion to Dismiss Petitioner Lisabeth Gansberg's ("Petitioner") Verified Petition for Discovery.
3. I am over the age of eighteen. I make this Affidavit based on my personal knowledge, as well as my review of FoUH's business records maintained in the ordinary course of its business. If called upon by a court of law, I would and could competently testify to the facts set forth in this Affidavit.
4. In my role as Chief Financial Officer, I have access to business records, including certain personnel records of Petitioner related to her employment with FoUH.
5. Attached to this Affidavit as Exhibit 1 is a true and correct copy of the offer letter given to Petitioner in connection with her employment at FoUH. Sensitive information has been redacted from the letter.

6. Attached to this Affidavit as Exhibit 2 is a true and correct copy of a sample pay stub issued to Petitioner in connection with her employment at FoUH. Sensitive information has been redacted from the pay stub.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Executed this 20th day of April 2026


Robert Spodek

FILED DATE: 5/8/2026 2:07 PM 2026L001683

EXHIBIT 1

[Page withheld: personal employment record (offer letter / pay stub)]

[Page withheld: personal employment record (offer letter / pay stub)]

EXHIBIT 2

[Page withheld: personal employment record (offer letter / pay stub)]

[Page withheld: personal employment record (offer letter / pay stub)]

FILED DATE: 5/8/2026 2:07 PM 2026L001683

EXHIBIT B

David Stein
Tel 312.456.1003
David.Stein@gtlaw.com

February 26, 2026

VIA EMAIL

The Garfinkel Group, LLC
Attn: Haskell Garfinkel
701 N. Milwaukee Ave.
Chicago, IL 60712
haskell@garfinkelgroup.com
andrew@garfinkelgroup.com

Re: Lisabeth Gansberg v. Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman; Case No. 2026 L 001683

Dear Haskell and Andrew:

As you know, Greenberg Traurig represents Friends of United Hatzalah, Inc. (“FoUH”), Eli Beer, Michael Littenberg-Brown, and Jerry Silverman. We are in receipt of the Illinois Supreme Court Rule 224 Petition that you filed on or around February 17, 2026, against FoUH, Eli Beer, Michael Littenberg-Brown, and Jerry Silverman (the “Petition”). We have also received your request that we waive service of summons as to all of the Respondents to the Petition.

We have authority to waive service on behalf of FoUH only, but not for the individual Respondents. We will return the waiver of service shortly as to FoUH only.

Putting aside the service issues, it is incumbent on us to bring to your attention that the Petition you filed is procedurally improper and facially defective. The purpose of a Rule 224 petition, as you know, is solely for taking discovery limited to the narrow issue of determining the proper defendant or defendants for a forthcoming lawsuit. This is typically done in medical malpractice or product liability matters when the defendant or defendants are truly unknown to plaintiff’s counsel. That is not the case here. In fact, the Petition pleads on its face that Ms. Gansberg was employed by FoUH. While Respondents each reserve all defenses to any lawsuit you might file, you need nothing more to file whatever lawsuit you believe is appropriate as against FoUH. Likewise, if you intend on suing the other Respondents in their individual capacities, you know who they are.

The Illinois Appellate Court recently affirmed sanctions levied against a plaintiff’s counsel for conduct similar to your filing. As the Court stated, “Rule 224 is inapplicable when the ***identity of any potential defendant is already known.***” *Ingram v. Intili*, 2022 IL App (1st) 210656, ¶ 13 (emphasis added). “Once a potential defendant’s identity is learned, a petitioner can then file a

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Operates as: * A branch of Greenberg Traurig, P.A.; *Greenberg Traurig Germany, LLP; *Greenberg Traurig Limited; *A separate UK registered legal entity; *Greenberg Traurig, S.C.; *Greenberg Traurig Studio Legale Associato; *Greenberg Traurig Khalid Al-Thabity; *Greenberg Traurig Brazil Consultores em Direito Estrangeiro - Direito Estadunidense; *Greenberg Traurig LLP Foreign Legal Consultant Office; *Greenberg Traurig Singapore LLP; *A branch of Greenberg Traurig, P.A.; Florida, USA; *GT Tokyo Hottetsu Jimusho and Greenberg Traurig Gakokuhjimubengoshi Jimusho; *Greenberg Traurig Nowakowska-Zimoch Wysokinski sp.k.

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February 26, 2026

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case and use the discovery provisions of the rules or the Code to conduct full discovery of those named as respondents-in-discovery to determine who in fact was responsible.” *Id.* The face of the Petition identifies the potential defendants and is thus improper.

To the extent that you believe there is any ambiguity into who Ms. Gansberg’s employer was, she was employed by FoUH. Accordingly, you have been provided with the name of Ms. Gansberg’s employer as well. On this basis, FoUH hereby demands that you terminate the Petition to avoid unnecessary time and expense for the Parties. If you decline to do so, FoUH intends to move to terminate the Petition and seek its attorneys’ fees and costs incurred in connection with doing so. *See id.* at ¶ 17 (affirming award of sanctions after petitioner refused to terminate Rule 224 petition “after he was provided with the name of the [potential defendant] because the purpose of the rule had been satisfied.”).

Accordingly, please advise whether you will terminate the Petition on or before March 6, 2026. FoUH continues to reserve all rights and remedies.

Best Regards,



David J. Stein

cc: Naomi Beer, *via e-mail only*
Tracy Gerber, *via e-mail only*

FILED DATE: 5/8/2026 2:07 PM 2026L001683

EXHIBIT C



March 10, 2026

Via Email

David J. Stein, Esq.
Greenberg Traurig, LLP
360 North Green Street, Suite 1300
Chicago, Illinois 60607
David.Stein@gtlaw.com

Re: Case No. 2026 L 001683 - *Lisabeth Gansberg v. Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman (Settlement Communication)*

Dear David:

We write in response to your February 26, 2026 letter. At the outset, Ms. Gansberg wishes to express her sincere respect for FoUH's mission and for the extraordinary commitment of United Hatzalah's volunteers, donors, and staff worldwide. That said, your recent correspondence suggests that no meaningful investigation or corrective action has been undertaken in response to the serious concerns raised in our December 17, 2025 letter. On December 26, 2025, your colleague Tracy Gerber acknowledged receipt of our correspondence and represented that "we are reviewing your letters and will provide a more substantive response in due course," but no such substantive response has ever been provided. To date, we have received nothing addressing the allegations on the merits, documenting any internal review, or identifying any remedial steps.

Instead, counsel summarily dismissed the allegations, stating: "[s]uffice it to say that our clients disagree with and dispute all of your clients' allegations and accusations." Your February 26, 2026 letter confirms the same approach. Rather than engage with the substance of the Petition, you merely assert that Ms. Gansberg "was employed by FoUH," demand dismissal of the Rule 224 Petition, and suggest that she may "file whatever lawsuit [she] believes is appropriate as against FoUH," notably omitting any reference to the individuals against whom claims have been asserted.

Our investigation, along with your correspondence, indicates that some members of executive leadership may have used FoUH and related structures to serve their personal interests. Additionally, after our client was terminated for protected activity, these individuals are now attempting to transfer responsibility for their actions onto the organization.

I. No Claim Has Been Asserted Against FoUH

Petitioner has not asserted any claim against Friends of United Hatzalah, Inc. ("FoUH") in any complaint or petition for damages. To the contrary, Petitioner has not yet made any accusations targeting FoUH. The sole pre-suit correspondence, the December 17, 2025 letter, was addressed exclusively to Eli Beer

March 10, 2026

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and Michael Littenberg-Brown in their individual capacities. That letter asserted claims against those two individuals, not against FoUH. FoUH neither received that letter nor was its subject.

The same is true of the December 25, 2025 letter addressed to the executive members of the FoUH and United Hatzalah boards. That letter, too, confined its allegations to the conduct of Beer, Littenberg-Brown, and Silverman individually. It did not assert claims against FoUH. Rather, it called upon the boards to exercise their independent fiduciary responsibilities by investigating the individuals' conduct and implementing governance reforms. At every stage, Petitioner has deliberately distinguished between the individuals' personal misconduct and the organization. Yet despite receiving both the December 17 and December 25 letters, Respondents have never provided a substantive response on the merits.

II. The Petition Is Proper

The Petition is not a complaint. It asserts no causes of action against FoUH or anyone else. It serves a narrow purpose: to obtain limited pre-suit discovery so Petitioner can identify the proper defendants before filing suit.

The Petition does not seek discovery about parties Petitioner already knows. Instead, it seeks information necessary to identify unknown entities, undisclosed legal relationships, and issues such as whether “United Hatzalah International” or “UH International” exists as a legal entity in any jurisdiction and, if so, its legal status, governance structure, and role in U.S. operations; the capacity in which Mr. Silverman acted, whether individually, on behalf of another entity, or pursuant to what arrangement; and whether additional domestic or foreign parties may be liable in damages. Rule 224 exists to address precisely those issues.

III. *Ingram* Does Not Apply

Your reliance on *Ingram v. Intili*, 2022 IL App (1st) 210656, is misplaced. In *Ingram*, the petitioner misused Rule 224 even though the relevant defendants were already known, and counsel engaged in improper procedural conduct. That is not this case. Petitioner has not filed a complaint, has not used Rule 224 as a substitute for ordinary discovery, and has not sought discovery beyond the Rule's limited purpose. She seeks to identify unknown entities, the capacities in which known individuals acted, and undisclosed contractual and organizational relationships. *Ingram* does not bar that.

IV. The Identities of All Persons and Entities Potentially Liable in Damages Remain Unknown

Your own correspondence confirms the confusion that the Petition seeks to resolve. In Ms. Gerber's December 26, 2025 letter, Greenberg Traurig accused our office of conflating “FoUH, United Hatzalah, their leaders, board members and roles.” If the structure and lines of authority were truly as straightforward as your February 26 letter suggests, there would be nothing to conflate.

The identities of those potentially liable for damages remain unclear. Mr. Beer has identified himself both as President of FoUH and as Founder and President of several legal entities collectively known as United Hatzalah. The information currently available indicates that, while employed by FoUH and working in the United States, Mr. Beer made major operational decisions involving activities on the ground in Israel. Those responsibilities had nothing to do with fundraising efforts in the United States and were well beyond FoUH's stated mandate as registered with the IRS and the State of New York. They therefore bear directly on the

identity of all legal entities that may be responsible in damages.

Mr. Silverman also stated that United Hatzalah International either supervises or integrates Friends of United Hatzalah, and Mr. Littenberg-Brown's title changed from "Vice President of FoUH" to "Chief Executive Officer of United Hatzalah International."

Even now, FoUH's own public-facing materials continue to conflate the relevant entities rather than clarify them. A February 27, 2026 job posting for a "Director of Human Resources" identifies Friends of United Hatzalah ("FoUH") as the hiring organization, states that the role will "lead and oversee the full HR function for FoUH," and describes the position as based in FoUH's New York headquarters, yet also states that the Director of Human Resources "will report to the CEO of United Hatzalah International." In other words, FoUH publicly advertised a senior FoUH role, based in FoUH's N.Y. office and responsible for FoUH's human-resources function, while directing that employee to report to an entity, "United Hatzalah International," whose legal identity, status, and relationship to FoUH remain undisclosed. That public job posting serves to reinforce the necessity of the Petition.

Your assertion that FoUH "employed" Petitioner does not resolve those issues. Even if FoUH turns out to be one employer, that fact does not answer whether other entities also exercised employer authority, whether joint-employer principles apply, or whether the same individuals acted on behalf of FoUH, another entity, or both. Petitioner did not file the Petition to "discover" that FoUH exists. She filed it to determine the identities of all persons and entities potentially liable in damages as contemplated by Rule 224. Discovery propounded will be narrow, limited, and solely focused on the issues raised in the Petition.

V. Respondents Use FoUH as a Shield

It is Respondents, not Petitioner, who appear intent on placing FoUH squarely on the hook. Your letter insists that "she was employed by FoUH" and urges Petitioner to "file whatever lawsuit you believe is appropriate as against FoUH." At the same time, your letter advances a single narrative that channels all scrutiny, and any potential liability, toward FoUH while blocking inquiry into the conduct, authority, and capacities of other entities and the individual Respondents. FoUH should not be used as an institutional shield that prevents inquiry into their conduct.

At this point, Respondents' position appears to be that the individuals exercised the relevant authority and control, but FoUH alone should bear the legal exposure. Rule 224 does not require Petitioner to accept that premature attribution on counsel's say-so.

We note that the current management's apparent strategy, deploying a tax-exempt nonprofit organization and its resources to shield themselves from personal liability for their own alleged misconduct, raises serious questions. FoUH is a Section 501(c)(3) charitable organization. Its assets and resources, including the retention of counsel, exist to further its exempt purposes, not to insulate individual fiduciaries from the consequences of their personal conduct.

The use of organizational resources to defend individuals against claims that have been asserted against them personally, and the interposition of FoUH as a litigation shield to prevent discovery into those individuals' conduct, may itself constitute a breach of the fiduciary duties owed by FoUH's officers and directors to the organization and its charitable mission. The Board of FoUH may wish to consider whether this litigation

strategy serves the organization's interests or only those of the individuals it is being used to protect.

VI. The Sanctions Threat Lacks Merit

Your threat of sanctions is unfounded and unsupported by Illinois law. The Petitioner is following the specific process outlined by Illinois law to file against the proper parties, which is not grounds for sanctions. In contrast, it would be improper for the Respondents to force the Petitioner, under threat of sanctions, to either file a lawsuit based on statements from opposing counsel or to exclude potentially responsible parties because they cannot access crucial information that remains with the Respondents. Rule 224 was designed specifically to prevent such outcomes.

VII. The Individual Respondents May Have Acted Outside Any Legitimate Scope of Authority

In addition to the information contained in our client's correspondence of December 17, 2025, our attorneys have subsequently reviewed a substantial amount of additional evidence. Based on this review, it appears that some actions taken by the individual Respondents and other possible defendants may not have been within any proper agency capacity and may instead implicate, among other things, 18 U.S.C. §§ 1341, 1343 (mail and wire fraud); 18 U.S.C. § 1001 (false statements in matters within federal jurisdiction); 18 U.S.C. §§ 1503, 1512 (obstruction of justice, witness tampering, and evidence tampering); 18 U.S.C. § 371 (conspiracy to commit an offense against, or to defraud, the United States); 18 U.S.C. §§ 1956–1957 (money laundering); 18 U.S.C. § 1962, with terms defined in 18 U.S.C. § 1961 (RICO); 22 U.S.C. § 2778 and 22 C.F.R. Part 129 (unlawful brokering of defense articles or defense services under the Arms Export Control Act and ITAR); N.Y. Penal Law §§ 175.05, 175.10 (falsification of business records); 225 ILCS 460/9 and 225 ILCS 460/1 *et seq.* (violations of the Illinois Solicitation for Charity Act); 815 ILCS 505/2 and 815 ILCS 505/1 *et seq.* (violations of the Illinois Consumer Fraud and Deceptive Business Practices Act); and 720 ILCS 5/8-2 (conspiracy under Illinois law).

Your colleague's letter of December 26, 2025 states that Petitioner's concerns are "conclusory." They are not. The December 17, 2025 correspondence identified, among other things, donor fraud, "[v]olunteer Protection" fundraising materials, directives that staff should not mention "guns," representations that "100%" of donations were going to Israel, allegations regarding edited Zoom recordings, deleted WhatsApp messages, and the suppression or concealment of reports and communications. Prior to her termination, our client engaged in numerous instances of protected activity including repeatedly raising issues of donor fraud to the named individuals.

This issue may become highly relevant because Illinois law does not hold an employer liable for acts that fall so far outside the scope of employment or apparent agency that one cannot reasonably treat them as part of the employment relationship. *Rodman v. CSX Intermodal, Inc.*, 405 Ill. App. 3d 332, 336 (1st Dist. 2010). Illinois applies a settled three-part test: the act must be of the kind the employee was hired to perform, must occur substantially within authorized time and space limits, and must be actuated, at least in part, by a purpose to serve the employer. Conduct that is purely personal, criminal, fraudulent, retaliatory, or otherwise incapable of being understood as even an overzealous performance of assigned duties falls outside that scope. *Id.* Thus, it is entirely foreseeable that the individual Respondents' actions were so far outside any lawful agency or employment role that FoUH itself may ultimately contend their conduct cannot be attributed to it at all.

VIII. Your Firm's Inconsistent Positions Regarding Representation and Service

Your agreement to accept service only for FoUH, but not for the individual Respondents, while at the same time advancing a unified position on behalf of all Respondents, highlights the very ambiguity that necessitated the Petition. That selective posture allows Respondents to speak with one voice when it is advantageous to do so, while preserving uncertainty as to the individuals' formal status, roles, and alignment of interests.

This inconsistency has deepened over time. On December 26, 2025, Ms. Gerber's letter confirmed that Greenberg Traurig represented FoUH, Eli Beer and Michael Littenberg-Brown. Your February 26, 2026 letter now purports to also represent Jerry Silverman. Yet your letter simultaneously states that you have authority to waive service on behalf of FoUH only, but not for the individual Respondents. If Greenberg Traurig represents the individual Respondents, as both letters expressly state, and makes legal arguments on their behalf, then your firm plainly has authority to accept or waive service on their behalf. While a defendant may decline to waive service under 735 ILCS 5/2-213(e), it is difficult to reconcile your firm's assertion that it lacks *authority* to waive service for the individuals with its simultaneous exercise of authority to correspond, make legal arguments, and demand termination of the Petition on their behalf.

Petitioner should not be required to accept counsel's unified attribution of responsibility to FoUH while counsel simultaneously declines to accept service on behalf of the individuals it claims to represent. If you represent the individual Respondents in this matter, then you should accept service on their behalf. If you choose not to, please clarify the scope of your representation and whether you will be appearing for them in this proceeding.

IX. Return of Property

As it relates to your December 26, 2025 request for the return of all property, our client made multiple affirmative attempts to return FoUH property, but your client failed to take the steps necessary to effectuate that return. FoUH acknowledged that return required coordination regarding dimensions and weight and confirmed that it was "looking into a local business/vendor" to pack and retrieve the items, noting that this process could take several days, after which no action was taken. Notwithstanding Ms. Gansberg's repeated efforts and FoUH's acknowledged responsibility for arranging logistics, your December 26, 2025 letter asserts that she failed to return property while ignoring the fact that any delay resulted from FoUH's own failure to follow through on the return process it controlled. Please inform us of a date and time that a courier will be available to pick up the items, and we will ensure that they are returned promptly.

X. Conclusion

If your clients wish to discuss resolving all matters, our client is open to constructive dialogue; however, hostile responses that are ungrounded in fact and law are unhelpful and only serve to steel our client's resolve. We look forward to your response.

March 10, 2026

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FILED DATE: 5/8/2026 2:07 PM 2026L001683

Warm regards,

/s/ Haskell Garfinkel

Garfinkel Group, LLC

cc: Tracy L. Gerber, Esq., via email (gerbert@gtlaw.com)
Naomi G. Beer, Esq., via email (beern@gtlaw.com)
Jessica Golden Cortes, Esq., via email (jcortes@dglaw.com)
Ina B. Scher, Esq., via email (ischer@dglaw.com)

FILED DATE: 5/8/2026 2:07 PM 2026L001683

EXHIBIT D

David Stein
Tel 312.456.1003
David.Stein@gtlaw.com

March 26, 2026

VIA EMAIL

The Garfinkel Group, LLC
Attn: Haskell Garfinkel
701 N. Milwaukee Ave.
Chicago, IL 60712
haskell@garfinkelgroup.com
andrew@garfinkelgroup.com

Re: Lisabeth Gansberg v. Friends of United Hatzalah, Inc., Eli Beer, Michael Littenberg-Brown, and Jerry Silverman; Case No. 2026 L 001683

Dear Haskell and Andrew:

This correspondence is in response to your March 10, 2026 letter. Your letter does not merit a response to each and every false and improper allegation, we write to respond specifically to several misguided contentions.

First, your letter is confusing, contradictory, and put simply, legally and factually incorrect. While entirely unsubstantiated, it is nonsensical to argue that Ms. Gansberg has not, through your letter writing campaign to date, raised a potential claim against Friends of United Hatzalah, Inc. ("FoUH"). Your prior letters purported to assert potential claims under a myriad of statutes, including the Illinois Whistleblower Act, the Federal RICO statute and employment-based claims for failure to accommodate a disability, retaliation and wrongful termination, among a laundry list of others. The claims you purport to assert in those letters, the monetary amount sought and the preservation demand you made would not logically be asserted against individuals alone, including because they did not individually employ Ms. Gansberg. And the statements in your most recent March 10, 2026, letter regarding potential joint-employer liability among FoUH and other affiliated entities further serve to demonstrate how there is absolutely no basis to pretend that Ms. Gansberg is not asserting claims against FoUH.

That being said, if it is your intention to limit Ms. Gansberg's claims to ones against the individuals alone, you clearly know who those individuals are. If this is the case, there cannot be any basis for a Rule 224 Petition.

To the extent, alternatively, Ms. Gansberg *intends* to assert claims against both the individuals and an organization, there is also no need for any Rule 224 Petition for the reasons set forth in our February 26, 2026, letter: Ms. Gansberg is aware of the identity of at least one of the potential

Greenberg Traurig, LLP | Attorneys at Law

360 North Green Street | Suite 1300 | Chicago, IL 60607 | T +1 312.456.8400 | F +1 312.456.8435

Abu Dhabi; Albany; Amsterdam; Aspen; Atlanta; Austin; Berlin; Boston; Charlotte; Chicago; Dallas; Delaware; Denver; Dubai; Fort Lauderdale; Houston; Las Vegas; London; Long Island; Los Angeles; Mexico City; Miami; Milan; Minneapolis; Munich; New Jersey; New York; Northern Virginia; Orange County; Orlando; Philadelphia; Phoenix; Portland; Riyadh; Sacramento; Salt Lake City; San Diego; San Francisco; São Paulo; Seoul; Shanghai; Silicon Valley; Singapore; Tallahassee; Tampa; Tel Aviv; Tokyo; Warsaw; Washington, D.C.; West Palm Beach; Westchester County.

Operates as: "A branch of Greenberg Traurig, P.A.; "Greenberg Traurig Germany, LLP;" "Greenberg Traurig Limited;" "A separate UK registered legal entity;" "Greenberg Traurig, S.C.;" "Greenberg Traurig Studio Legale Associato;" "Greenberg Traurig Khalid Al-Thebity;" "Greenberg Traurig Brazil Consultores em Direito Estrangeiro - Direito Estadunidense;" "Greenberg Traurig LLP Foreign Legal Consultant Office;" "Greenberg Traurig Singapore LLP;" "A branch of Greenberg Traurig, P.A., Florida, USA;" "GT Tokyo Hottetsu Jimusho and Greenberg Traurig Gakokuhogimubangoshi Jimusho;" "Greenberg Traurig Nowakowska-Zimoch Wysokinski sp.k."

www.gtlaw.com

March 26, 2026

Page 2

defendants – any of the three individuals – *and* she also knows the identity of at least one potential organizational defendant – her former employer, FoUH.

Even if we attempt to follow your flawed logic and assume that FoUH is not a potential defendant in any forthcoming lawsuit, your prior correspondence, including the March 10, 2026, letter, lists Mr. Beer, Mr. Littenberg-Brown, and Mr. Silverman as the target of Ms. Gansberg's claims. Therefore, as the Court in *Ingram* correctly stated, and as we already advised you in our prior letter, "Rule 224 is inapplicable [because] the **identity of any potential defendant is already known.**" *Ingram v. Intili*, 2022 IL App (1st) 210656, ¶ 13 (emphasis added). "Once a potential defendant's identity is learned, a petitioner can then file a case and use the discovery provisions of the rules or the Code to conduct full discovery of those named as respondents-in-discovery to determine who in fact was responsible." *Id.* At the risk of simply repeating our prior correspondence, **the face of the Petition identifies the potential defendants and thus your Rule 224 Petition is improper.** Regardless of whether Ms. Gansberg understands the identity of each corporate affiliate or other entity related to FoUH in some way, she can pursue whatever lawsuit she believes is appropriate against FoUH and/or the individual defendants identified in your prior correspondence, and use the discovery process to discover any additional relevant information she might want to know about other affiliate entities.

The remainder of the assertions in your March 10 letter warrant no written response. We reiterate the request that you dismiss the Rule 224 Petition, or we will be forced to move to dismiss it for all of the reasons set forth here and in our prior letter of February 26, 2026.

As to Ms. Gansberg's return of her FoUH property, there is no reason why it has taken so long for her to return it. We request that she immediately return everything to Greenberg Traurig, LLP's Chicago office, to the attention of the undersigned.

Finally, you allude to discussing settlement. If your client would like to do so, please provide a reasonable demand.

We look forward to hearing from you as soon as possible to arrange return of the company property.

Best Regards,



David J. Stein

cc: Naomi Beer, *via e-mail only*
Tracy Gerber, *via e-mail only*

FILED
5/8/2026 2:07 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
37990614

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on May 15, 2026, at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall appear in Courtroom 2204 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602 before Judge Stephanie Saltouros or any judge that may be sitting in her stead, and present the attached **RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S COMBINED 2-619.1 AMENDED MOTION TO DISMISS PETITIONER'S VERIFIED PETITION FOR DISCOVERY**, a copy of which is attached and hereby served upon you.

Dated: May 8, 2026

Respectfully submitted,

By: /s/ David J. Stein
David J. Stein
David.Stein@gtlaw.com
Kara E. Angeletti
angelettik@gtlaw.com
Greenberg Traurig, LLP
360 North Green Street, Suite 1300
Chicago, Illinois 60607
312.456.8400
Attorney No. 36511

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on May 8, 2026, the foregoing **NOTICE OF MOTION** was served via the Odyssey Illinois electronic filing system upon all counsel of record listed below.

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
haskell@garfinkelgroup.com

/s/ David J. Stein

FILED
5/8/2026 2:19 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
37991094

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2026-L-001683
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	Hon. Stephanie Saltouros
ELI BEER, MICHAEL LITTENBERG-BROWN,	)	
and JERRY SILVERMAN,	)	Calendar Z
	)	
Respondents.	)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on May 15, 2026, at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall appear in Courtroom 2204 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602 before Judge Stephanie Saltouros or any judge that may be sitting in her stead, and present the attached **RESPONDENTS ELI BEER, MICHAEL LITTENBERG-BROWN, AND JERRY SILVERMAN'S MOTION TO QUASH SERVICE AND MOTION TO RECONSIDER WAIVER**, a copy of which is attached and hereby served upon you.

Dated: May 8, 2026

Respectfully submitted,

By: /s/ David J. Stein
David J. Stein
David.Stein@gtlaw.com
Kara E. Angeletti
angelettik@gtlaw.com
Greenberg Traurig, LLP
360 North Green Street, Suite 1300
Chicago, Illinois 60607
312.456.8400
Attorney No. 36511

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on May 8, 2026, the foregoing **NOTICE OF MOTION** was served via the Odyssey Illinois electronic filing system upon all counsel of record listed below.

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
haskell@garfinkelgroup.com

/s/ David J. Stein

FILED
5/12/2026 4:56 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2026L001683
Calendar, Z
38045896

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LISABETH GANSBERG,

Petitioner,

v.

FRIENDS OF UNITED HATZALAH, INC.,
ELI BEER, MICHAEL LITTENBERG-BROWN,
and JERRY SILVERMAN,

Respondents.

No. 2026-L-001683

Hon. Stephanie Saltouros

Calendar Z

**PETITIONER'S AGREED MOTION TO STAY BRIEFING SCHEDULE ON
RESPONDENT FoUH'S MOTION TO DISMISS PENDING RULING ON THE
MOTION TO QUASH SERVICE AND MOTION TO RECONSIDER WAIVER**

Petitioner Lisabeth Gansberg ("Petitioner"), by and through her undersigned counsel, with the agreement of Respondent FoUH, by and through their counsel, respectfully moves this Court to stay the briefing schedule on the pending Motion to Dismiss until this Court has ruled upon the Foreign Respondents and Jerry Silverman's Motion to Quash Service and Motion to Reconsider Waiver. In support, Petitioner states as follows:

1. On April 20, 2026, FoUH filed Respondent Friends of United Hatzalah, Inc.'s Combined 2-619.1 Motion to Dismiss Petitioner's Verified Petition for Discovery (the "Motion to Dismiss"). FoUH filed an amended version of the Motion to Dismiss on May 8, 2026. It is FouH's position that the amendment did not alter the arguments in or the basis of the Motion.

2. On April 21, 2026, the Court held an initial case management conference and entered a briefing schedule on the Motion to Dismiss, providing in relevant part that: (i) Petitioner shall respond by May 12, 2026; (ii) Respondent(s) shall reply by May 26, 2026; (iii) the parties shall provide courtesy copies to the Court at a status on May 27, 2026 at 9:00 a.m.; and (iv) the matter is set for case management/ruling on June 19, 2026 at 9:00 a.m. (the "Briefing Schedule").

3. At the April 21, 2026 conference, the Court further ruled that “[A]ll Respondents have been served pursuant to this court’s ruling.” The Court also held on the record that individually named Respondents Eli Beer, Michael Littenberg-Brown, and Jerry Silverman had waived any objections to personal jurisdiction.

4. On May 8, 2026, Respondents Beer, Brown, and Silverman filed their Motion to Quash Service and Motion to Reconsider Waiver (the “Motion to Quash and Reconsider”). Among other things, the Motion to Quash and Reconsider asks this Court to (i) quash purported service as to the Foreign Respondents (Beer and Brown), (ii) modify the April 21, 2026 order to reflect that the Foreign Respondents have not been served, and (iii) reconsider its ruling that the Foreign Respondents and Silverman had waived their objections to personal jurisdiction. Silverman stated in the Motion to Quash and Reconsider that he will agree to waive service following a ruling on the Motion to Quash and Reconsider.

5. The Motion to Quash and Reconsider is set for presentment on May 15, 2026 at 10:00 a.m.

6. It is Petitioner’s position that the Court’s disposition of the Motion to Quash and Reconsider directly bears on the scope of, and proper parties to, the Motion to Dismiss. If this Court grants the Motion to Quash and Reconsider in whole or in part, the universe of Respondents properly before the Court on the Motion to Dismiss, and accordingly the scope of the relief that can be granted on the Motion to Dismiss, will be materially affected.

7. It is Petitioner’s position that requiring Petitioner to respond to the Motion to Dismiss before the Court resolves the Motion to Quash and Reconsider would force Petitioner to brief issues that may be mooted or reshaped by the Court’s forthcoming ruling and would risk requiring supplemental briefing to address any change in the parties properly before the Court.

8. In the interests of judicial economy, conservation of the parties' and the Court's resources, and orderly resolution of the threshold service and jurisdictional questions raised by the Motion to Quash and Reconsider in advance of substantive briefing on the Motion to Dismiss, Petitioner respectfully requests that the Briefing Schedule be stayed in its entirety pending the Court's ruling on the Motion to Quash and Reconsider.

9. Counsel for Petitioner and counsel for Respondents have conferred. FoUH disagrees with the basis for Petitioner's position and maintains that its Motion to Dismiss can be independently resolved notwithstanding the Motion to Quash and Reconsider. However, FoUH does not object to Petitioner's requested relief in the form of the stay sought in the instant Motion. Beer, Brown, and Silverman are not parties to FoUH's Motion to Dismiss. To the extent their response on Petitioner's request impacts whether Petitioner's Motion is agreed, Beer, Brown, and Silverman do not object to Petitioner's requested relief.

10. This Motion is brought in good faith and not for purposes of delay, and no party will be prejudiced by the requested stay.

WHEREFORE, Petitioner, with the agreement of all Respondents, respectfully requests that this Court enter an order:

- A. Staying the April 21, 2026 Briefing Schedule on the Motion to Dismiss pending the Court's ruling on the Foreign Respondents and Silverman's Motion to Quash Service and Motion to Reconsider Waiver;
- B. Vacating the May 12, 2026 deadline for Petitioner's response, the May 26, 2026 deadline for FoUH's reply, the May 27, 2026 courtesy-copies status, and the June 19, 2026 case management/ruling date;

- C. Providing that, within seven (7) days after entry of an order disposing of the Motion to Quash and Reconsider, the parties shall confer and submit a proposed amended briefing schedule for the Court's approval; and
- D. Granting such other and further relief as the Court deems just and proper.

Dated: May 12, 2026

LISABETH GANSBERG

By: /s/ *Haskell Garfinkel*
One of Her Attorneys

Haskell Garfinkel
THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
T: (312) 736-7991
haskell@garfinkelgroup.com
Attorney Code No.: 63494

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

LISABETH GANSBERG,

Petitioner,

V.

FRIENDS OF UNITED HATZALAH, INC.,
ELI BEER, MICHAEL LITTENBERG-BROWN,
and JERRY SILVERMAN,

Respondents.

No. 2026-L-001683

Hon. Stephanie Saltouros

Calendar Z

**[PROPOSED] ORDER STAYING BRIEFING SCHEDULE ON RESPONDENT
FRIENDS OF UNITED HATZALAH, INC.'S MOTION TO DISMISS**

This matter coming before the Court on Petitioner’s Agreed Motion to Stay Briefing Schedule on Respondent Friends of United Hatzalah, Inc.’s Motion to Dismiss Pending Ruling on the Foreign Respondents and Silverman’s Motion to Quash Service and Motion to Reconsider Waiver (the “Agreed Motion”), the parties having agreed to the relief requested, due notice having been given, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED:

1. The Agreed Motion is GRANTED.
2. The April 21, 2026 Briefing Schedule on Respondent Friends of United Hatzalah, Inc.'s Motion to Dismiss is STAYED pending the Court's ruling on the Foreign Respondents and Silverman's Motion to Quash Service and Motion to Reconsider Waiver.

3. The May 12, 2026 deadline for Petitioner's response to the Motion to Dismiss, the May 26, 2026 deadline for Respondent's reply, the May 27, 2026 courtesy-copies status, and the June 19, 2026 case management/ruling date are VACATED.
4. Within seven (7) days after entry of an order disposing of the Motion to Quash Service and Motion to Reconsider Waiver, the parties shall confer and submit a proposed amended briefing schedule for the Court's approval.

ENTERED:

Hon. Stephanie D. Saltouros
Circuit Court Judge

Date_____

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on May 12, 2026, the foregoing PETITIONER'S AGREED MOTION TO STAY BRIEFING SCHEDULE ON RESPONDENT FRIENDS OF UNITED HATZALAH, INC.'S MOTION TO DISMISS PENDING RULING ON THE FOREIGN RESPONDENTS AND SILVERMAN'S MOTION TO QUASH SERVICE AND MOTION TO RECONSIDER WAIVER was served via the Odyssey Illinois electronic filing system upon all counsel of record.

By: /s/ *Haskell Garfinkel*

THE GARFINKEL GROUP, LLC
701 North Milwaukee Avenue, Suite 1
Chicago, Illinois 60642
T: (312) 736-7991
haskell@garfinkelgroup.com
Attorney Code No.: 63494
Attorneys for Petitioner

#7 & #8
C 10-
FT

Administrative Order

(03/21/25) CCL 0068

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Gansberg Plaintiff Case No. 26-L-1683
v.
Friends of United Hatzidakis Hall Defendant Motion Call: Cal 2

ADMINISTRATIVE ORDER

This cause coming before the court for administrative status, the court being fully advised in the premises and having jurisdiction of the parties and/or the subject matter,

IT IS HEREBY ORDERED AS FOLLOWS:

- ☐ 4010 Supreme Court Rule 224 Petition dismissed by order of court, the Court finding that Supreme Court Rule 224 is not applicable in the instant case;
- ☐ 4099 Case previously disposed of on _____;
- ☐ 4010 Case dismissed by order of court, based on no activity since _____;
- ☐ 4005 Case dismissed for want of prosecution, based on FAILURE TO SUBMIT CMC ON _____;

_____, OR TRIAL CERTIFICATION REPORT ON _____;

- ☒ 4372/1986 Case is transferred *instanter* to Room 2005 for reassignment to a commercial calendar, pursuant to Law Division Administrative Order 92-2; **EMPLOYMENT ISSUE**
- ☐ 4372/1986 Case is transferred *instanter* to Room 2005 for reassignment, pursuant to Law Division Administrative Order 17-1. This case was previously assigned to **NO TORT INVOLVED**

☒ (_____) Other: All other issues entered and continued 4285
and prior briefing schedule on Motion to Dismiss
filed by FOUH is vacated. 6/22/26 Ruling

ENTERED:

Dated: _____

/s/

Judge

Judge's No.

Mariyana T. Spyropoulos, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

ENTERED
Judge Stephanie Salsouros-2161
MAY 15 2026
MARIYANA T. SPYROPOULOS
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

Stephanie D. Salsouros
4331

District 1

Case Summary

Case No. 2026L001683

**Lisabeth Gansberg-vs-Eli Beer,Michael Littenberg
Brown,Jerry Silverman,Friends of United Hatzalah, Inc.**

§
§
§
§
§

Location: **District 1**
Judicial Officer: **Calendar, Z**
Filed on: **02/11/2026**
Cook County Attorney Number: **63494**
Cook County Attorney Number: **36511**

Case Information

Case Type: Petitions for Discovery - Non Jury
Case Status: **02/11/2026 Pending**

Assignment Information

Current Case Assignment

Case Number 2026L001683
Court District 1
Date Assigned 02/11/2026
Judicial Officer Calendar, Z

Party Information

Lead Attorneys

Plaintiff Gansberg, Lisabeth

**GARFINKEL GROUP LLC
Retained**

[REDACTED]
[REDACTED]
[REDACTED]

Defendant Beer, Eli

**Stein, David Joseph
Retained**

**Friends of United Hatzalah, Inc. Stein, David Joseph
Retained**

**Littenberg Brown, Michael Stein, David Joseph
Retained**

**Silverman, Jerry Stein, David Joseph
Retained**

Events and Orders of the Court

06/22/2026  **CANCELED Continued Case Management** (9:00 AM) (Judicial Officer: Saltouros, Stephanie D.)
Resource: Location L2204 Court Room 2204
Resource: Location D1 Richard J Daley Center
Stricken

05/15/2026  **Strike Or Vacate An Order - Allowed -** (Judicial Officer: Saltouros, Stephanie D.)
BRIEFING SCHEDULE STRICKEN
Party: Attorney GARFINKEL GROUP LLC;
Attorney Stein, David Joseph;

District 1

Case Summary

Case No. 2026L001683

Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

BRIEFING SCHEDULE STRICKEN

05/15/2026



Strike From Case Management Call - Allowed (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Attorney Stein, David Joseph;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

05/15/2026



Transfer Case To Presiding Judge Within District/Division (Judicial Officer: Saltouros, Stephanie D.)

1986-PRESIDNG JUDGE

Party: Attorney GARFINKEL GROUP LLC;
Plaintiff Gansberg, Lisabeth

1986-PRESIDNG JUDGE

05/15/2026

First Time Motion Hearing (10:00 AM) (Judicial Officer: Saltouros, Stephanie D.)

Resource: Location L2204 Court Room 2204

Resource: Location D1 Richard J Daley Center

05/15/2026

First Time Motion Hearing (10:00 AM) (Judicial Officer: Saltouros, Stephanie D.)

Resource: Location L2204 Court Room 2204

Resource: Location D1 Richard J Daley Center

MINUTES - 05/15/2026



Transfer Case To Presiding Judge Within District/Division (Judicial Officer: Saltouros, Stephanie D.)

1986-PRESIDNG JUDGE

Party: Attorney GARFINKEL GROUP LLC;
Plaintiff Gansberg, Lisabeth

1986-PRESIDNG JUDGE



Strike Or Vacate An Order - Allowed - (Judicial Officer: Saltouros, Stephanie D.)

BRIEFING SCHEDULE STRICKEN

Party: Attorney GARFINKEL GROUP LLC;
Attorney Stein, David Joseph;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

BRIEFING SCHEDULE STRICKEN



Strike From Case Management Call - Allowed (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Attorney Stein, David Joseph;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

Granted;

05/12/2026



Routine Motion Filed

AGREED ROUTINE MOTION TO STAY BRIEFING

Party: Plaintiff Gansberg, Lisabeth

AGREED ROUTINE MOTION TO STAY BRIEFING

District 1

Case Summary

Case No. 2026L001683

- 05/08/2026  Notice Of Motion Filed
Notice of Motion
Party: Defendant Beer, Eli
Notice of Motion
- 05/08/2026  Notice Of Motion Filed
Notice of Motion
Party: Defendant Friends of United Hatzalah, Inc.
Notice of Motion
- 05/08/2026  Motion To Dismiss Filed
Respondent Friends Of United Hatzalah, Inc.???s Combined 2-619.1 Amended Motion To Dismiss Petitioner???s Verified Petition For Discovery
Party: Defendant Friends of United Hatzalah, Inc.
Respondent Friends Of United Hatzalah, Inc.???s Combined 2-619.1 Amended Motion To Dismiss Petitioner???s Verified Petition For Discovery
- 05/08/2026  Appearance Filed - Fee Paid -
Appearance
Party: Defendant Beer, Eli
Party 2: Attorney Stein, David Joseph
Appearance
- 05/08/2026  Motion Filed
Party: Defendant Beer, Eli
Party 2: Attorney Stein, David Joseph
- 04/27/2026 **CANCELED First Time Motion Hearing** (10:00 AM) (Judicial Officer: Saltouros, Stephanie D.)
Resource: Location L2204 Court Room 2204
Resource: Location D1 Richard J Daley Center
Stricken
- 04/21/2026  Service By Special Order Of Court - Denied (Judicial Officer: Saltouros, Stephanie D.)
Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth
- 04/21/2026  Courtesy Copies Required - Allowed (Judicial Officer: Saltouros, Stephanie D.)
Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth
- 04/21/2026  Case Continued For Case Management Conference - Allowed - (Judicial Officer: Saltouros, Stephanie D.)
Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth
- 04/21/2026  Strike From Case Management Call - Allowed (Judicial Officer: Saltouros, Stephanie D.)
4-27-26

District 1

Case Summary

Case No. 2026L001683

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

4-27-26

04/21/2026  File Amendment, Additional, Amended Pleadings - Allowed - (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

04/21/2026  File Amendment, Additional, Amended Pleadings - Allowed - (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

04/21/2026 **First Time Case Management** (9:45 AM) (Judicial Officer: Saltouros, Stephanie D.)

Resource: Location L2204 Court Room 2204

Resource: Location D1 Richard J Daley Center

MINUTES - 04/21/2026

 File Amendment, Additional, Amended Pleadings - Allowed - (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

 File Amendment, Additional, Amended Pleadings - Allowed - (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

 Courtesy Copies Required - Allowed (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

 Case Continued For Case Management Conference - Allowed - (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

 Strike From Case Management Call - Allowed (Judicial Officer: Saltouros, Stephanie D.)

4-27-26

District 1

Case Summary

Case No. 2026L001683

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

4-27-26



Service By Special Order Of Court - Denied (Judicial Officer: Saltouros, Stephanie D.)

Party: Attorney GARFINKEL GROUP LLC;
Defendant Beer, Eli;
Defendant Friends of United Hatzalah, Inc.;
Defendant Littenberg Brown, Michael;
Defendant Silverman, Jerry;
Plaintiff Gansberg, Lisabeth

Continued;

04/20/2026



Notice Of Motion Filed

Party: Defendant Friends of United Hatzalah, Inc.

04/20/2026



Motion To Dismiss Filed

Respondent Friends Of United Hatzalah, Inc.???s Combined 2-619.1 Motion To Dismiss Petitioner???s Verified Petition For Discovery

Party: Defendant Friends of United Hatzalah, Inc.

Respondent Friends Of United Hatzalah, Inc.???s Combined 2-619.1 Motion To Dismiss Petitioner???s Verified Petition For Discovery

04/17/2026



Appearance Filed - Fee Paid -

Appearance

Party: Defendant Friends of United Hatzalah, Inc.

Appearance

04/15/2026



Notice Of Motion Filed

Party: Plaintiff Gansberg, Lisabeth

04/07/2026



Motion Filed

MOTION FOR ISSUANCES

Party: Plaintiff Gansberg, Lisabeth

MOTION FOR ISSUANCES

03/18/2026



Electronic Notice Sent

Party: Plaintiff Gansberg, Lisabeth

Party 2: Attorney GARFINKEL GROUP LLC

03/17/2026



Proof Of Service Filed

Party: Plaintiff Gansberg, Lisabeth

02/17/2026



Summons Issued And Returnable

Party: Plaintiff Gansberg, Lisabeth

02/11/2026

New Case Filing

02/11/2026



Petition For Discovery

Petition for Discovery Before Suit Pursuant to Supreme Court Rule 224

Party: Plaintiff Gansberg, Lisabeth

Petition for Discovery Before Suit Pursuant to Supreme Court Rule 224

NOTICE OF FILING and PROOF OF SERVICE

In the Appellate Court of Illinois
First Judicial District

LISABETH GANSBERG,	)	
<i>Petitioner in Discovery-Respondent,</i>	)	
	)	
v.	)	
	)	
ELI BEER, MICHAEL LITTENBERG-	)	
BROWN, and JERRY SILVERMAN,	)	No.
<i>Respondents in Discovery-Petitioners,</i>	)	
	)	
FRIENDS OF UNITED HATZALAH, INC.,	)	
<i>Respondent in Discovery.</i>	)	
	)	
	)	
	)	

The undersigned, being first duly sworn, deposes and states that on May 21, 2026, there was electronically filed and served upon the Clerk of the above court the Supporting Record. Service of the Supporting Record and Report of Proceedings will be accomplished via email to the following counsel of record:

Garfinkel Group, LLC
Haskell Garfinkel (ARDC No. 6274971)
haskell@garfinkelgroup.com
701 N. Milwaukee Avenue
Chicago, Illinois 60642

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct.

/s/ David J. Stein
David J. Stein