

NOTICE REGARDING PLAINTIFFS' MOTION TO DISMISS THE CLASS ACTION
CASE CHICAGO HEADLINE CLUB ET AL. V. KRISTI NOEM ET AL.
Case Number 25-cv-12173 (Northern District of Illinois)

This Notice contains information relating Class Members' right to object to Plaintiffs' pending motion to voluntarily dismiss the class action lawsuit known as *Chicago Headline Club, et al. v. Kristi Noem et al*, pending in the United States District Court for the Northern District of Illinois.

Background

1. This lawsuit alleged that the Department of Homeland Security violated the constitutional rights of those who wanted to protest, observe, report, express their religious views, or otherwise speak out against immigration enforcement efforts in the Northern District of Illinois during an operation referred to as Operation Midway Blitz. Operation Midway Blitz was led by Gregory Bovino, who is one of the Defendants in this case.

2. The lawsuit was brought to stop alleged unconstitutional behavior by the federal government. The lawsuit did not seek to recover money damages.

Class Definition

3. The district court certified the case as a class action to pursue the allegations in the case, defining the following class and subclasses:

Class: All persons who are or will in the future non-violently demonstrate, protest, observe, document, or record at Department of Homeland Security immigration enforcement and removal operations in the Northern District of Illinois.

Religious Exercise Subclass: All persons who are or will in the future engage in religious expression in the form of prayer, procession, song, preaching, or proselytizing at Department of Homeland Security immigration enforcement and removal operations in the Northern District of Illinois.

Press Subclass: All persons who are or will in the future engage in news gathering or reporting at Department of Homeland Security immigration enforcement and removal operations in the Northern District of Illinois.

Litigation and Pending Motion to Dismiss

4. The district court previously granted a preliminary injunction prohibiting the Defendants in the case from taking certain actions while the case was pending.

5. The Defendants filed an appeal of the preliminary injunction, and the United States Court of Appeals for the Seventh Circuit stayed enforcement of that injunction until that court could decide the appeal. The stay of the injunction meant that the injunction could no longer be enforced.

6. Defendant Bovino and the agents operating Midway Blitz under his command recently left the Northern District, and Plaintiffs' counsel has not received any reports of the type of unconstitutional behavior that necessitated this case since November 8, 2025.

7. Plaintiffs have therefore asked the Court to dismiss this case.

Right to object to dismissal

8. Class Members as defined in Paragraph 3 above have the right to object to the request to dismiss the case. To submit an objection, a Class Member must mail their objection to the Clerk of the Court the United States District Court for the Northern District of Illinois, as well as sending a copy to Class Counsel at the law firm Loevy & Loevy at the below addresses:

Clerk's Office, United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, 60604	Loevy & Loevy Attn: CHC v. Noem 311 N. Aberdeen St., 3d Floor Chicago, IL 60607
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Objections should explain the factual and legal basis for opposing the pending motion to dismiss and should include the case name and number: *CHC v. Noem*, Case No. 25-cv-12173.

9. Objections must be postmarked by no later than December 19, 2025.

10. On January 8, 2026 at 2:30 p.m., the Court will hold a hearing in Courtroom 1403 of the United States District Court for the Northern District of Illinois, 219 S. Dearborn St., Chicago IL 60604 to determine whether this case should be dismissed. Any changes to this date, time, or location will be posted to Loevy & Loevy's website: www.loevy.com