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

CITY OF CHICAGO, an Illinois municipal corporation,

Plaintiff,

v.

GLOCK INC., a Georgia corporation; GLOCK Ges.m.b.H, an Austrian company; EAGLE GUN CLUB LLC f/d/b/a EAGLE SPORTS RANGE, an Illinois company; RANGE PLUS, LLC f/d/b/a EAGLE SPORTS RANGE, an Illinois company; 5900 LLC d/b/a EAGLE SPORTS RANGE, an Illinois company; and MIDWEST SPORTING GOODS CO., an Illinois corporation,

Defendants.

No. 2024 CH 06875

**DEFENDANTS', EAGLE GUN CLUB LLC, RANGE PLUS, LLC, AND 5900 LLC,
MOTION TO ADOPT DEFENDANTS' MOTIONS FOR CERTIFICATION OF ISSUES
FOR INTERLOCUTORY APPEAL PURSUANT TO ILLINOIS SUPREME COURT
RULE 308 AND TO EXTEND THIS COURT'S DISCOVERY STAY**

Defendants, EAGLE GUN CLUB LLC, RANGE PLUS, LLC, and 5900 LLC ("Eagle Gun Club Defendants"), by their attorneys, QUINTAIROS, PRIETO, WOOD, & BOYER, P.A., and for their Motion to Adopt, state as follows:

1. On September 18, 2025, the Court denied the motions to dismiss of Glock Inc., Glock Ges.m.b.H., Midwest Sporting Goods Co. and the Eagle Gun Club Defendants. On October 16, 2025, Glock Inc., Glock Ges.m.b.H., and Midwest Sporting Goods Co. filed motions, and supporting memoranda, asking that this Court certify for purposes of interlocutory appeal significant questions of law pursuant to Illinois Supreme Court Rule 308. By way of this motion, the Eagle Gun Club Defendants seek leave to adopt these motions and memoranda of its co-

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defendants. Judicial economy will be served if these defendants are permitted this relief. The Eagle Gun Club Defendants share the same market position as Midwest.

2. The Eagle Gun Club Defendants similarly seek to join its co-defendants' requests to extend the discovery stay previously entered by the Court. The plaintiff's discovery requests are oppressive and clearly intended to intimidate. They seek the disclosure of the total revenue and profit of these defendants, detailed banking information, and marketing materials. For example, the plaintiff's requests for production directed to the Eagle Gun Club Defendants total 48 in number and seek the production of the following items and more: corporate formation documents, property leases, tax returns, bank statements, current and former employees pay stubs, employee contracts, sales records, communications of all kinds, contracts with outside vendors, training manuals, advertisements, marketing materials, and operating agreements.

3. If the defendants are required to respond to the plaintiff's discovery requests they will incur substantial legal expenses to challenge these requests, devote hundreds of man-hours or more to gather the requested material at substantial cost, and potentially disclose the private information of its current and former employees, its private financial information, its marketing and business plans, and its banking information and tax returns, while substantial legal issues remain outstanding. Such an outcome would be decidedly unfair to the defendants, not to mention a waste of this Court's resources addressing objections, motions for protective order and otherwise supervising the discovery process. It is well within this Court's discretion to stay discovery until these issues are expeditiously addressed on appeal.

WHEREFORE, Defendants, EAGLE GUN CLUB LLC, RANGE PLUS, LLC, and 5900 LLC respectfully request that this Court grant them leave to adopt motions brought by Glock Inc., Glock Ges.m.b.H., and Midwest Sporting Goods Co. pursuant to Illinois Supreme Court Rule 308

to certify for purposes of interlocutory appeal certain questions of law at issue in this Court's September 18, 2025 Order, to extend the discovery stay, and for such other relief as the Court deems just.

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

By: /s/John P. Lynch, Jr.

Attorneys for Defendants,

**EAGLE GUN CLUB LLC, RANGE PLUS, LLC, and
5900 LLC**

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