

FILED
6/11/2026 8:44 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

MARY CATHERINE SCHEFFKE,
individually and as Founder of Chicago
French Bulldog Rescue, Inc., NFP,

Plaintiff,
v.

Case No.: 2026CH04709
Hon. Judge Eve M. Reilly
Calendar 7

SUSAN SCHULTZ and VICTORIA
McELLIOTT,
individually and as Directors of Chicago French
Bulldog Rescue, Inc., NFP,
Defendants,
and

CHICAGO FRENCH BULLDOG RESCUE, INC., NFP,
Nominal Defendant.

**PLAINTIFF'S MOTION FOR RULE TO SHOW CAUSE WHY DEFENDANTS SHOULD
NOT BE HELD IN INDIRECT CIVIL CONTEMPT.**

Plaintiff Mary Catherine Scheffke, by and through her attorneys, respectfully moves this Court to enter a rule to show cause why Defendants should not be held in indirect civil contempt for their failure to comply with the affirmative directive of the Court's May 21, 2026 Temporary Restraining Order. More than three weeks after this Court ordered Defendants to restore Plaintiff's access to the Rescue's funds, that access has not been restored. Plaintiff previously refrained from seeking contempt, electing the least burdensome path of repeated informal demand. Defendants' continued non-compliance has exhausted that path. In support, Plaintiff states as follows.

I. The Court's Order.

On May 18, 2026, the Board removed Ms. Scheffke from all CFBR bank accounts and disabled her debit card, the mechanism through which she pays for veterinary care, food, medicine, and supplies for the dogs in her care. On May 21, 2026, this Court entered a Temporary Restraining

Order. In addition to its prohibitory terms, the Order directed affirmative relief: Defendants “are required to restore Plaintiff’s access to the rescue’s funds so she can adequately care for the animals in her care.” (Order ¶ 13.) The purpose of the Order was to preserve the status quo pending the preliminary-injunction hearing now set for June 16, 2026.

II. Defendants Have Not Complied with the Order’s Affirmative Directive.

Defendants took no action to restore Ms. Scheffke’s access in the days immediately following the Order. Ms. Scheffke went to the bank herself on Friday, May 23, 2026 with a copy of the Order, where she was told the bank’s legal department would require up to five days to act. A replacement debit card was not ordered until May 28, 2026, a full week after the Order, and only after Plaintiff’s counsel raised the issue of non-compliance in writing. Now more than ten days after the Court’s Order, and as of the date of this Motion, Ms. Scheffke still has not received a functioning debit card.

More fundamentally, Defendants have refused to restore the balance of the access the Order required despite being asked on multiple occasions.

Ms. Scheffke opened the CFBR checking account and was a co-signatory with full visibility into the account’s transactions for years, until that access was removed on May 18, 2026 as part of the same sequence that gave rise to this litigation. Defendants have not restored her co-signatory status. They have not restored her login access to the financial accounts. When Plaintiff’s counsel specifically requested these items, Defendants’ counsel responded: “We disagree with your interpretation of the Court’s order.” (Exh. A)

The result is that Defendants have restored only what they could not avoid, a debit card that has not yet arrived, while withholding the account access and transactional visibility that Ms. Scheffke held for years and that the Order directed be restored.

III. The Court Should Hold Defendants in Contempt

A temporary restraining order is a binding order of the Court, and the Court possesses inherent authority to enforce its own orders and to ensure they are not rendered meaningless through delay or partial performance. The Order did not direct Defendants to issue a single debit card. It directed them to “restore Plaintiff’s access to the rescue’s funds.”

Defendants appear to treat the Order as satisfied by the issuance of a debit card. That reading turns the Order on its head. A debit card permits Ms. Scheffke to pay for the animals’ care; it does not permit her to see the accounts. The status quo this Court froze on May 21 was the access Ms. Scheffke in fact held: she opened the CFBR checking account, she was its co-signatory, and she had full visibility into its transactions, until that access was stripped on May 18. The status quo a temporary restraining order preserves is not always “a condition of rest”; it may be “a condition of action . . . necessary to prevent irreparable harm.” *Kalbfleisch v. Columbia Cmty. Unit Sch. Dist. No. 4*, 396 Ill. App. 3d 1105, 1117 (5th Dist. 2009). This Court relied on that very principle in entering the Order. (Ex. A at 2.) Restoring Ms. Scheffke’s ability to spend while withholding her ability to see treats the status quo as a condition of rest. The Order required the condition of action that the animals’ care, and Ms. Scheffke’s oversight of the Rescue’s funds as its founder and a sitting director, demand. Partial restoration is not compliance.

Defendants’ stated basis for withholding the remaining access is that they “disagree” with Plaintiff’s reading of the Order. A party’s disagreement with the scope of a court order is not a license to decline compliance; it is a reason for the Court to clarify and enforce its directive. Plaintiff has deliberately refrained from seeking a rule to show cause or sanctions, electing the least burdensome path. But the access the Court ordered restored has now been withheld for more than ten days, during which Ms. Scheffke has remained the sole caregiver for medically fragile

animals, including one with cancer requiring ongoing oncology treatment. The status quo the Order was entered to preserve cannot be preserved while the affirmative directive of that Order goes unfulfilled.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order directing Defendants, immediately and in no event later than three business days, to:

1. Enter a rule to show cause directing Defendants to appear and show cause why they should not be held in indirect civil contempt for failure to comply with paragraph 13 of the Court's May 21, 2026 Order;
2. Order that Defendants may purge any contempt by, within three business days: (a) restoring Ms. Scheffke's co-signatory status on all CFBR bank and financial accounts; (b) restoring her login and online viewing access to all CFBR financial accounts; (c) ensuring a functioning debit card is issued and delivered to her; and (d) providing her visibility into all transactions on CFBR accounts since May 18, 2026
3. Award Plaintiff her reasonable attorney fees and costs incurred in bringing this Motion; and;
4. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ R Tamara de Silva
DE SILVA LAW OFFICES, LLC
R Tamara de Silva, Esq.
110 North Wacker Drive, Suite 2500
Chicago, IL 60606
Office: (312) 500-8424
tamara@desilvalawoffices.com

/s/ Jonathan Lubin
LAW OFFICE OF JONATHAN LUBIN
Jonathan Lubin, Esq.
8800 Bronx Avenue, Suite 100-H
Skokie, IL 60077
Telephone: (773) 954-2608
jonathan@lubinlegal.com

CERTIFICATE OF SERVICE

The undersigned certifies that on June 11, 2026, he caused a copy of the foregoing to be served upon counsel of record through the Court's electronic filing system.

/s/ Jonathan Lubin