

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

JENNIFER J. MILLER, DARIN E. MILLER,)
SECOND AMENDMENT FOUNDATION, INC.,)
ILLINOIS STATE RIFLE ASSOCIATION, and)
ILLINOIS CARRY,)

Plaintiffs,)

v.)

Case No. 3:18-CV-3085

MARC D. SMITH, in his official capacity as Acting)
Director of the Illinois Department of Children and)
Family Services, and KWAME RAOUL, in his)
official capacity as Attorney General of the State)
of Illinois,)

Defendants.)

**F.R.CIV.P. 15(a)(2) MOTION FOR LEAVE
TO FILE AMENDED COMPLAINT**

Plaintiffs, JENNIFER J. MILLER, DARIN E. MILLER, SECOND
AMENDMENT FOUNDATION, INC., ILLINOIS STATE RIFLE ASSOCIATION,
and ILLINOIS CARRY, by and through LAW FIRM OF DAVID G. SIGALE, P.C.,
their attorney, hereby moves this Honorable Court, pursuant to F.R.Civ.P. 15(a)(2),
for leave to file an Amended Complaint in this matter. In support thereof, Plaintiffs
state as follows:

1. Plaintiffs filed a currently-pending Complaint challenging Section 10/7
of the Illinois Child Care Act of 1969 (225 ILCS 10/7), as well as Joint Committee of
Administrative Rules (“JCAR”) R.406.2 and R.402.8(a), both facially and as applied
to home day care providers who are qualified to possess and carry a firearm for self-
defense purposes.

CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On May 10, 2019, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
Attorney for Plaintiffs