

FILED
7/8/2025 1:54 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2025L007458
Calendar, W
33468978

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

MARCELLUS LONG,
Plaintiff,

v.

CDW GOVERNMENT LLC,
Defendant.

Case No. 2025L007458

PLAINTIFF'S MOTION TO COMPEL PRODUCTION UNDER RULE 201(k)

NOW COMES Plaintiff, MARCELLUS LONG, pro se, pursuant to Illinois Supreme Court Rule 201(k), and respectfully moves this Honorable Court for an order compelling Defendant, CDW GOVERNMENT LLC, to produce a document previously requested in discovery. In support thereof, Plaintiff states as follows:

1. On June 23, 2025, Plaintiff served upon Defendant a written request for production, specifically requesting:

“Any document signed by Plaintiff *prior* to the start of his employment with CDW Government LLC, authorizing or consenting to any deduction to Plaintiff's earned wages.”

2. This request was made in conjunction with a good faith notice under Illinois Supreme Court Rule 201(k), clearly stating that if no response was received within 14 days, Plaintiff would move to compel.

3. More than 14 days have passed since the request was served. As of the filing of this Motion, Defendant has not responded to the request, nor provided any objections or indication of compliance.

4. The requested document is central to Plaintiff's claim under the Illinois Wage Payment and Collection Act (820 ILCS 115/1 et seq.), which prohibits wage deductions unless one of the following applies:

- (a) The deduction is required by law;
- (b) The deduction is to the benefit of the employee; or
- (c) The deduction is expressly authorized in writing by the employee at the time of the deduction.

5. The discovery request at issue seeks any document signed by Plaintiff authorizing or consenting to deductions made after wages were already deemed earned, as required by 820 ILCS 115/9. Defendant either possesses this document or does not.

6. Plaintiff strongly affirms that no such document exists and respectfully requests that the record reflect this fact.

7. Plaintiff notes that Defendant is a major government contractor, leading Plaintiff to reasonably expect Defendant's strict compliance with the Illinois Wage Payment and Collection act and all applicable recordkeeping obligations.

8. Plaintiff maintains that no genuine dispute exists as to any material fact under Count I, and that the absence of any signed authorization should be formally acknowledged and considered by the Court.

WHEREFORE, Plaintiff, MARCELLUS LONG, respectfully requests that this Honorable Court:

A. Enter an Order compelling Defendant to produce any document signed by Plaintiff *prior* to the start of employment authorizing or consenting to wage deductions;

B. Compel Defendant to produce said document within seven (7) days of the Court's Order;

C. Reserve Plaintiff's right to seek sanctions under Illinois Supreme Court Rule 219 should Defendant continue to delay proceedings instead of acknowledging that no such document exists; and

D. Grant such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

See Exhibit A – Plaintiff's 201(k) Discovery Request Filed June 24, 2025

/s/ Marcellus Long

Marcellus Long

Pro Se Plaintiff

P.O. Box 60832

Chicago, IL 60660

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(312) 469-0683

DATED: July 8th, 2025

Exhibit A: Plaintiff's 201(k) Discovery Request Filed June 24, 2025

6/24/2025 6:15 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2025L007458
Calendar, W

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS LAW DIVISION

MARCELLUS LONG,
Plaintiff,

v.

CDW GOVERNMENT LLC,
Defendant.

Case No.: **2025L007458**

PLAINTIFF'S INITIAL REQUEST FOR DOCUMENT PRODUCTION

(Preservation of Rights Under Illinois Supreme Court Rule 201(k))

TO:

CDW Government LLC
c/o Illinois Corporation Service C
801 Adlai Stevenson Dr.
Springfield, IL 62703

FROM:

Marcellus Long
Pro Se Plaintiff
P.O. Box 60832
Chicago, IL 60660
legal@marcelluslong.com
(312) 469-0683

DATE: 06/20/25

Pursuant to the Illinois Supreme Court Rules and in anticipation of formal discovery, Plaintiff requests that Defendant **produce the following within 14 days of receipt** of this request:

1. Any document signed by Plaintiff prior to the start of his employment with CDW Government LLC, authorizing or consenting to wage deductions.

This request is made in good faith. If no response is received within 14 days, Plaintiff will file a motion to compel in accordance with Illinois Supreme Court Rule 201(k).

Enforced by right, not request,

/s/ Marcellus Long
Marcellus Long
Pro Se Plaintiff

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