

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

AMERICAN CIVIL LIBERTIES UNION,
AMERICAN CIVIL LIBERTIES UNION OF
ILLINOIS, CHICAGO ALLIANCE AGAINST
SEXUAL EXPLOITATION, SEX WORKERS
OUTREACH PROJECT CHICAGO,
ILLINOIS STATE PUBLIC INTEREST
RESEARCH GROUP, INC., and MUJERES
LATINAS EN ACCIÓN,

Plaintiffs,

v.

CLEARVIEW AI, INC., a Delaware
corporation,

Defendant.

Case No.: 2020 CH 04353

Honorable Pamela McLean Meyerson

JOINT MOTION FOR ENTRY OF CONSENT ORDER AND DISMISSAL

Plaintiffs American Civil Liberties Union, American Civil Liberties Union of Illinois, Chicago Alliance Against Sexual Exploitation, Sex Workers Outreach Project Chicago, Illinois State Public Interest Research Group, Inc., and Mujeres Latinas en Acción hereby move the Court, with Defendant Clearview AI, Inc.'s consent, for entry of the attached Consent Order of Permanent and Time-Limited Injunctions. In support thereof, Plaintiffs state:

1. Plaintiffs filed this action on May 28, 2020, seeking injunctive relief against Defendant Clearview AI, Inc. for alleged violations of the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.*
2. On September 24, 2021, Clearview AI, Inc. filed its Answer, Affirmative Defenses, and Counterclaim seeking injunctive relief pursuant to the Illinois Biometric Information Privacy Act, 740 ILCS 14/25(e).

3. The Parties have since reached a settlement, which contemplates the entry of a consent order, attached hereto as Exhibit 1. The Settlement Agreement is attached hereto as Exhibit 2.

4. The Court can enter consent orders as “a court’s recording of an agreement reached by the parties in settlement of a dispute or claim,” which “is not a judicial determination of their rights.” *See People ex rel. Fahner v. Colorado City Lot Owners & Taxpayers Ass’n*, 106 Ill. 2d 1, 8 (1985). The Court may maintain jurisdiction for enforcement of such orders. *See id.*

5. The Parties accordingly request entry of Exhibit 1, which will also dismiss this action with prejudice. (*See Ex. 1 at ¶ 8.*)

Respectfully submitted,

Dated: May 9, 2022

By: /s/ J. Eli Wade-Scott
One of Plaintiffs’ Attorneys

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* *Admitted pro hac vice*

CERTIFICATE OF SERVICE

I, J. Eli Wade-Scott, an attorney, hereby certify that on May 9, 2022 I served the above and foregoing document by causing a true and accurate copy of the same to be filed and transmitted to all counsel of record via the Court's electronic filing system.

/s/ J. Eli Wade-Scott_____