IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA, *Plaintiff,* *v.* MICHAEL RABBITT, KATHERINE MARIE ABUGHAZALEH, ANDRE MARTIN, BRIAN STRAW, and CATHERINE SHARP, *Defendants,* *and* William R. Hogan, Jr., *Intervenor-Movant*	)	No. 25 CR 693 Judge April M. Perry

MOTION OF ASSISTANT UNITED STATES ATTORNEY WILLIAM R. HOGAN, JR. FOR LEAVE TO INTERVENE AND OTHER RELIEF

Intervenor-Movant, Assistant United States Attorney William R. Hogan, Jr., ("AUSA Hogan"), through his counsel, Shelly B. Kulwin, Kulwin, Masciopinto & Kulwin LLP, respectfully moves this Court: (i) for leave to intervene in this case, specifically with respect to proceedings set forth in the Court's November 2, 2026 Order, including the evidentiary hearing currently set for November 16, 2026, (ii) for a short continuance of the November 16, 2026 evidentiary hearing, and (iii) for clarification of the procedure(s) that will

be employed at the forthcoming evidentiary hearing. In support, Hogan states as follows:

1. On October 1, 2026, the Court held a hearing in this matter. At that time, the Court granted former assistant United States Attorney Sheri Mecklenburg's Motion to Intervene in this case and stated:

> "Given that…the questions presented could affect not only the individual law licenses of the AUSAs who have been implicated but also the possibility of a criminal prosecution, the stakes are very personal and very high and I don't think the U. S. Attorney's Office necessarily will be aligned with each of the individual AUSAs so intervention is both appropriate and I think necessary to ensure that Ms. Mecklenburg's interests are represented. **I would make the same ruling with respect to any of the other AUSAs should they ask to intervene.**" United States v. Rabbitt, 25 CR 693, Trscpt. at p. 4 (emphasis added). (A copy of the transcript is attached hereto as Exhibit 1.)

2. The Court referenced AUSA Hogan on several occasions in its November 2, 2026 Order. Further, the Court ordered AUSA Hogan to testify under oath at the November 16, 2026 evidentiary hearing. At this time, while AUSA Hogan is unaware of the position the government may take at the upcoming hearing or the possible testimony of any other AUSA (or the United States Attorney), it is quite possible that the government's interests, as well as some of the other proposed witnesses' testimony, "may not be aligned" with his. Given that reality, and that the stakes at the upcoming hearing and in the proceedings themselves are "very personal and very high", AUSA Hogan

seeks leave to intervene individually in these proceedings.

3. Next, AUSA Hogan requests a brief continuance of the evidentiary hearing in this matter from November 16, 2026 to November 23, 2026, as his attorney, Shelly B. Kulwin ("Kulwin"), will be out of Chicago from November 8 through November 15, 2026 in Big Bend, Texas on a long-planned trip. Kulwin will require several days to meet with AUSA Hogan and otherwise prepare for the hearing, which he will be unable to do if the hearing goes forward on November 16 given his travel plans. This request is not made for purposes of delay but strictly to allow Kulwin adequate time to meet with his client and prepare for this very serious matter. Alternatively, AUSA Hogan seeks a continuance to, at a minimum, November 19, 2026.

4. Finally, AUSA Hogan seeks clarification as to the procedure(s) the Court intends to employ at the evidentiary hearing. Specifically, AUSA Hogan seeks clarification as to who will be questioning the witnesses at that hearing; whether AUSA Hogan's counsel will be allowed to cross-examine all such witnesses and, if necessary, present his own evidence. Such clarification will allow AUSA Hogan to most effectively prepare for the upcoming proceedings.

WHEREFORE, Intervenor-Movant, Assistant United States Attorney William R. Hogan, Jr., respectfully moves this Court to enter an Order: (i) granting him leave to intervene in this case, specifically with respect to proceedings set forth in the Court's November 2, 2026 Order, including the

evidentiary hearing currently set for November 16, 2026, (ii) granting a short continuance of the November 16, 2026 evidentiary hearing, and (iii) clarifying the procedure(s) that will be employed at the forthcoming evidentiary hearing.

Respectfully submitted,

/s/ Shelly B. Kulwin

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CERTIFICATE OF SERVICE

I certify that on November 5, 2026, the foregoing pleading was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Shelly B. Kulwin