

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

ELLA M. SAMUEL,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 15-780-NJR-SCW
	)	
JESSICA TRAME,	)	
	)	
Defendant.	)	

**AFFIDAVIT OF JESSICA TRAME**

I, JESSICA TRAME, upon oath, depose and state that I have personal knowledge of the statements contained in this Affidavit; I understand the contents of this affidavit to be true and correct; I am competent to testify; and if called to testify, I would testify as follows:

1. I hold the position of Chief of the Firearm Services Bureau with the Illinois Department of State Police.
2. I am the Defendant in this matter.
3. On August 17, 2015, Plaintiff filed a Motion for Summary Judgment in this matter.
4. I cannot, at this time, present facts essential to oppose Plaintiff's Motion, because additional time is required to conduct discovery in this matter.
5. Defendant requires the opportunity to investigate, through discovery, the allegations in the Complaint in this matter, including Plaintiff's claim that she is a permanent resident of the state of Montana; her residence in the State of Illinois; any criminal records regarding the Plaintiff; and her status as a member of the United States Armed Forces as it pertains to various legal implications on her ability to possess firearms and carry firearms concealed in the State of Illinois.

EXHIBIT A

6. Further, Defendant requires the opportunity to investigate whether Plaintiff has standing to maintain the claim before the Court, which will depend, in part, on her current residence, permanent legal residence, and status with the United States Armed Forces.

7. Defendant requires the opportunity to investigate the fee arrangement between Plaintiff and his counsel, as Plaintiff has asserted a claim for attorneys' fees under 48 U.S.C. § 1988,

8. Defendant requires time, generally, to confer with her counsel, and provide adequate briefing to the Court on the questions presented to the Court.

FURTHER AFFIANT SAYETH NOT.

/s Jessica Trame

Jessica Trame  
Chief of Firearms Services Bureau  
Illinois Department of State Police

SUBSCRIBED and SWORN to

before me this 18 day of September, 2015.

/s Sheree D. McKane

Notary Public

