

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS**NEELIE PANOZZO, *et al.*,

Plaintiffs,

v.

RIVERSIDE HEALTHCARE; *et al.*,

Defendants.

Case No.: 2:21-cv-02292-CSB-EIL

**Plaintiffs' Proposed Statement of  
Material Facts in Support of their  
Motion for Preliminary Injunction**

1. Riverside Healthcare is a private, non-profit organization that operates a hospital and other facilities in Kankakee County, IL. It employs approximately 3,000 people.

2. On August 27, 2021, Riverside circulated a memorandum and policy to all employees announcing it was implementing Governor Pritzker's executive order and offering a process and form by which Riverside employees could secure a religious exemption.

3. On September 10, 2021, after President Biden's speech to the nation, Riverside circulated another memorandum to employees, stating that "Until we receive the [Emergency Temporary Standard from the federal Occupational Safety and Health Administration (OSHA)] and can review its contents in light of the existing emergency order issued by Governor Pritzker, Riverside will be temporarily suspending the decisions on pending religious and medical exemption requests . . ." *See* Mot. for TRO & PI, Exhibit F.

4. Nevertheless, after pledging to suspend all decisions on pending religious exemption requests until the OSHA Rule was published (which was November 5, 2021), on September 17, 2021, Riverside denied all religious exemption requests for all patient-facing employees, including those of Plaintiffs. *See* Mot. for TRO & PI, Exhibit H.

5. The Plaintiffs named on the attached schedule are currently employees or interns of Riverside Healthcare.

6. The Plaintiffs have a sincere religious objection to accepting the COVID-19 vaccine. *See* Exhibit D to Memo of Law.

7. The Plaintiffs have a sincere religious belief that their job at Riverside is also an exercise of their faith. *See* Exhibit D to Memo of Law.

8. Each of the Plaintiffs filed a timely request for a religious exemption.

9. Riverside denied the religious exemption applications of Plaintiffs.

10. Riverside would fire Plaintiffs for their non-vaccination but for an order from this Court.

11. Riverside would revoke the staff privileges and credentials of any licensed providers among Plaintiffs but for an order from this Court.

Dated: December 14, 2021

Respectfully Submitted,

NEELIE PANOZZO, ET AL.

By: /s/ Jeffrey M. Schwab  
One of their attorneys

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\*application for admission pending

## SCHEDULE OF CURRENTLY EMPLOYED PLAINTIFFS

Allison Berard
Alyse Hodgkin
Amber Denton
Amber Marcotte
Angela Burge
Anne Bridges
Ashley Goodman
Beth Norwick
Bobbie Rogers
Bonnie Gross
Cassidy Gerdes
Christopher Foster
Dakota Gable
Desneiges Hansen
Dianne Carr
Gary Hall
Holly Gade
Jamie Cockream
Janet Clifford

Janet Stryski
Jeanne James
Joanna Brychta
Judy Busato
Julia Stramaglia
Kathryn Hamblen
Kathryn Vana
Katlyn Schreiber
Kegan Wagner
Kelsey Tobey
Kelsey Tolmer
Kendra Outsen
Kimberly Cooper
Kristen Zigtema
Laura Wendt
Lauren Coash
Leo Vernon Hoaglund
Linda Kendziorek
Madigan Spenard

Malia Kollmann
Margaret Wehrle
Maxwell Memenga
Melissa Hennessy
Merissa Hubert
Michael Raef
Molly Snyder
Nadya Payne
Neelie Panozzo
Nicole Brewer
Phylicia Labriola
Rebecca O'Connor
Sherrie Robertson
Tara Kitchens
Tenise Irvin
Trishelle Henson
Valerie Bauer
Valerie Keitzman
Yvonne Walls