

**IN THE CIRCUIT COURT OF THE TWENTY SECOND JUDICIAL CIRCUIT,  
McHENRY COUNTY, ILLINOIS**

PEOPLE OF THE STATE OF ILLINOIS            )  
  )  
  )            No.            10 CF 1065  
  )  
  )  
CHRISTOPHER BATES                                )

**Katherine M. Keefe**  
Clerk of the Circuit Court  
\*\*\*Electronically Filed\*\*\*  
Transaction ID: 17111203718  
10CF001065  
07/01/2019  
McHenry County, Illinois  
22nd Judicial Circuit  
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**MOTION TO RECALL AND QUASH WARRANT**

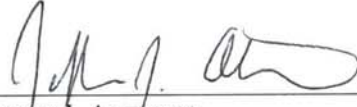
NOW COMES the Defendant, CHRISTOPHER BATES, by his attorneys, DONAHUE & WALSH, P.C., and respectfully requests this Honorable Court to recall and quash the warrant for his arrest and vacate the bond forfeiture entered in this matter,

IN SUPPORT OF THIS MOTION, IT IS AVERRED:

1. On or about May 29, 2010, the Defendant was arrested and charged with the offense of Aggravated Driving Under the Influence of Alcohol.
2. On April 12, 2012, the Defendant was sentenced to Conditional Discharge until October 15, 2013. Terms and conditions included the payment of fines and costs and completion of alcohol treatment.
3. On October 15, 2013, the Defendant failed to appear in court. The State was granted leave to file a petition to revoke conditional discharge, and a warrant issued for Defendant's arrest. The petition to revoke alleged that Defendant failed to pay fines, costs and fees and failed to appear.
4. On October 16, 2017, the State filed an amended petition for revocation which alleged that Defendant failed to pay fines, costs and fees, failed to appear in Court on October 15, 2013 and failed to file proof of completion of alcohol treatment.
5. On May 16, 2019, the Defendant paid the outstanding balance of fines, costs and fees totaling \$451.65, in full. The Defendant has also obtained and filed an updated alcohol evaluation indicating that he does not meet the diagnostic criteria for substance abuse disorder and no treatment is required.
6. Defendant is a resident of the State of Vermont and has otherwise led a productive and law abiding life since the instant matter.
7. Recalling and quashing the warrant for arrest does not prejudice the State in their prosecution or impede the ends of justice.

WHEREFORE, the Defendant, CHRISTOPHER BATES, respectfully moves this Honorable Court to enter an order recalling and quashing the warrant for his arrest in this matter, and any other relief this Court deems just and equitable.

Respectfully Submitted By:

A handwritten signature in black ink, appearing to read "Jeffrey J. Altman", written over a horizontal line.

JEFFREY J. ALTMAN  
ATTORNEY FOR DEFENDANT

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