

David Martin,
Plaintiff)
)
)
) Case 1:22-cv-06296
V.)
)
)
Attorney General Kwame Raoul)
Judge Gregory Emmett Ahern Jr.)
Unnamed Cook County Clerks)
Cook County)

I, David Martin, ask that this court give me the opportunity to verbally respond to the defendant's motion to dismiss. According to Rule 78 of the Federal Rules of Civil procedure, the court may make rulings without oral hearings. However, I respectfully move this Honorable Court to grant an oral hearing before making a decision on the pending Motion to Dismiss. An oral hearing is essential to ensure that the complexities of the issues, novel legal arguments, disputed facts, and due process considerations are adequately addressed, thereby promoting a fair and just resolution of this matter.

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Northern District of Illinois**

I. Complexity of the Issues:

The issues raised in this case involve nuanced legal questions that require comprehensive analysis. I argue that this case is unique because I am trying to prevent my state court appeal from being sabotaged. In addition, I am trying to get access to zoom features in future proceedings. An oral hearing would give me a chance to fully defend myself against the defendant's motion to dismiss. Most importantly it would give me an opportunity to provide clarity in my defense. I believe that this will enable the Court to gain a deeper understanding of the issues. The opportunity for live presentation and interaction would facilitate a more informed decision-making process by the Court.

II. Novel Legal Arguments:

This case presents novel legal arguments that have not been fully explored in previous jurisprudence. An oral hearing would provide the parties with the chance to expound on these original legal contentions and enable the Court to evaluate their merits in real-time. Such a hearing would allow for a robust discussion of the legal issues and contribute to the development of the law in this area.

III. Disputed Facts:

So far, the defendants have not disputed any of the facts. I believe they may now attempt to do so since I filed my answer to their motion. If they disputed material facts

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in this case, it may significantly impact the resolution of the Motion to Dismiss. An oral hearing would be crucial in determining the veracity of the contested facts. The live hearing process would afford the Court the opportunity to resolve factual disputes, and make a well-informed and just decision.

IV. Due Process Considerations:

Granting an oral hearing is vital to safeguarding due process rights and ensuring a fair and transparent judicial process. Rule 78 allows this court to enter a decision without an oral hearing. However, an oral hearing would afford both parties the opportunity to present their case in person, respond to arguments made by the opposing party, and address any concerns raised by the Court. This open and transparent process would promote the principles of due process and provide a more equitable resolution of this case.

I request that this Honorable Court grant an oral hearing before ruling on the Motion to Dismiss. I believe that an oral hearing will not only serve the interests of justice but also contribute to the efficient and accurate resolution of this case.

I appreciate the Court's attention to this matter and remain at your service for any further information or clarifications. Thank you for considering our motion.

**United States District Court
Northern District of Illinois**

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