

David Martin,  
Plaintiff  
  
V.  
  
Attorney General Kwame Raoul  
Judge Gregory Emmett Ahern Jr.  
Unnamed Cook County Clerks  
Cook County

1. On 11/14/2022 I filed a complaint against the defendants Attorney General Kwame Raoul, Judge Gregory Emmett Ahern Jr., Unnamed Cook County Clerks, Cook County.
2. On 11/14/2022 The defendant Judge Gregory Emmet Ahern Jr. was emailed a copy of my complaint and a notice of removal at [CCC.DomRelCR1508@cookcountyil.gov](mailto:CCC.DomRelCR1508@cookcountyil.gov).
3. On 11/14/2022 I filed a notice of removal in state court. **(see exhibit A)**
4. On 11/14/2022 the plaintiffs in the case 2002D056455 were emailed a copy of the notice of removal.
5. On 3/07/2023 I filed an amended complaint. The amended complaint did not contain a copy of the notice of removal.
6. On 3/20/2023 The defendants Attorney General Kwame Raoul and Judge Gregory Emmett Ahern Jr., were served a copy of my amended complaint.

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

**ARGUMENT**

On November 14<sup>th</sup> 2022 I emailed a notice of removal to Judge Gregory Emmett Ahern Jr. I also filed the notice of removal in the state court case 02D056455 (**see exhibit A**). The plaintiffs in the state court case were provided a copy of the notice of removal. I am refiling the notice of removal to ensure that it appears on the record in the case 1:22-cv-06296.

The state court case 02D056455 had become removable under 28 U.S. Code § 1446. (b)(3). It also became removable under 28 U.S. Code § 1441. (c)

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

**CERTIFICATION**

To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

*4/24/2023*

David Martin

5332 S. Princeton

Chicago IL, 60609

773-893-0813

E-mail: MartinvThompson@gmail.com

*David Martin*

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

**EXHIBIT A**

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

FILED  
11/14/2022 7:57 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2002D056455  
Calendar, 44  
20279369

David Martin,	)	
Plaintiff	)	
	)	
	)	1:22-cv-06296
V.	)	
	)	
State of Illinois	)	
Governor JB Pritzker	)	
States Attorney Kim Fox	)	
Illinois Department of Healthcare	)	
And Family Services	)	
Unknown Defendants	)	
Arnell Frances Thompson	)	

**NOTICE OF REMOVAL**

Currently case # 02D056455 is active and pending in the Circuit Court of Cook County. I desire to have this case removed and joined with the US District Court case# 1:22-cv-06296.

The Circuit Court Case has become removable under 28 U.S. Code § 1446.  
(b)(3)

The Circuit Court Case is also removable under 28 U.S. Code § 1441. (c)

United States District Court  
Northern District of Illinois

CERTIFICATION

To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

*11-14-2022*

David Martin  
5332 S. Princeton  
Chicago IL, 60609  
773-893-0813  
E-mail: MartinvThompson@gmail.com

*David Martin*

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

David Martin,  
Plaintiff

V.

Attorney General Kwame Raoul  
Judge Gregory Emmett Ahern Jr.  
Unnamed Cook County Clerks  
Cook County

)  
)  
)  
) case# 1:22-cv-06296  
)  
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)  
)

**NOTICE OF FILING**

**TO:**

**1. Name: Attorney General Kwame Raoul individually**

**and in his official capacity**

**Represented by: Mary Johnston**

**Street Address: 100 W. Randolph St., 13<sup>th</sup> Fl.**

**City and County: Chicago, Cook County**

**State and Zip Code: Illinois 60601**

**Phone: (312) 814-4417**

**E-Mail Address: [mary.johnston@ilag.gov](mailto:mary.johnston@ilag.gov)**

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

- 2. Name: Judge Gregory Emmett Ahern Jr. , individually  
and in his official capacity**

**Represented by: Mary Johnston**

**Street Address: 100 W. Randolph St., 13<sup>th</sup> Fl.**

**City and County: Chicago, Cook County**

**State and Zip Code: Illinois 60601**

**Phone: (312) 814-4417**

**E-Mail Address: [mary.johnston@ilag.gov](mailto:mary.johnston@ilag.gov)**

- 3. Unnamed Cook County Clerks individually  
and in their official capacity**

**Street Address: 118 N. Clark Street**

**City and County: Chicago**

**State and Zip Code: IL 60602**

**Phone: (312) 443-5500**

**E-Mail Address: [riskmgmt.genliability@cookcountyil.gov](mailto:riskmgmt.genliability@cookcountyil.gov)**



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

**4. Cook County**

**Street Address:** 118 N. Clark Street

**City and County:** Chicago

**State and Zip Code:** IL 60602

**Phone:** (312) 443-5500

**E-Mail Address:** [riskmgmt.genliability@cookcountyil.gov](mailto:riskmgmt.genliability@cookcountyil.gov)

**YOU ARE HEREBY NOTIFIED** That on April 24<sup>th</sup> 2023, I have electronically filed with the United States District Court for the Northern District of Illinois, a Notice of removal. A true and correct copy of the pleading is attached hereto and served upon you.

**PROOF OF SERVICE**

The undersigned hereby certifies pursuant to Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure that the aforesaid Notice and Motion was served on the above-named party at the address set forth above by [x] e-mail from MartinvThompson@gmail.com; [] personal delivery; [] facsimile; [] in the U.S. Mail at 100 W. Randolph St., Chicago, IL 60601, with first-class postage prepaid on or before 5:00 p.m. April 24<sup>th</sup> 2023.

*4/24/2023*

David Martin

5332 S. Princeton

Chicago IL, 60609

773-893-0813

E-mail: MartinvThompson@gmail.com

*David Martin*