

David Martin,
Plaintiff

V.

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

Case 1:22-cv-06296

NOTICE OF REMOVAL

BRIEF STATEMENT OF FACTS

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.
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 14th 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.

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

EXHIBIT A