

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

David Martin,	)	
Plaintiff	)	
	)	
	)	
V.	)	Case # 1:22-cv-06296
	)	
Attorney General Kwame Raoul	)	
Judge Gregory Emmett Ahern Jr.	)	
Unnamed Cook County Clerks	)	
Cook County	)	
Chief Deputy Clerk Gretchen Peterson	)	
Unknown employee of the Illinois Department of	)	
Employment Security	)	

**MOTION TO AMEND COMPLAINT**

I, David Martin, In pursuant to Federal Rule of Civil Procedure 15(a)(2), I ask that this court allow me to amend my complaint. In support of this motion I state the following;

I argue that Judge Ahern and Attorney General Raul will not be prejudiced by this amended complaint because the complaint does not contain any substantive changes as it relates to them... There was, however, a reference to an affidavit in the preceding complaint. However, I forgot to attach it. In this amended complaint, I have attached the affidavit.

Early on in this litigation, I requested a summons for all the defendants in this case. A summons was provided for Judge Ahern, and Attorney General Raul. A summons was not issued for the circuit court clerks. The reasoning given, was that an individual's name must be provided in order to issue a summons. This amended

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complaint names the clerk so that a summons can be issued.... I would have address this issue sooner, but I had a death in the family, and the defendants filed a motion to dismiss. The court directed me to file a request for an amended motion earlier.... I had trouble filing the amended motion because I have been struggling with some health issues.

The complaint does contain some amendments as it regards to the circuit court clerks. However, I argue that they will not be prejudiced by this because once served, they will have more than enough time to respond to my complaint.

The complaint also adds a new defendant. I argue that they will not be prejudiced because once served, they will have more than enough time to respond to my complaint.

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Wherefor I pray:

1. That this court accepts my amended complaint.
2. Any remedy that this court can provide.

Date of signing: *7/28/2023*

David Martin

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Email: martinvtompson@gmail.com

Signature of Plaintiff

*David Martin*