) ) )
) Case 1:22-cv-06296
) ) ) )

## **NOTICE OF FILING**

TO:

1. Name: Attorney General Kwame Raoul individually and in his official capacity

Represented by: Benjamin F. Jacobson

Street Address: 100 W. Randolph St., 12<sup>th</sup> Fl.

City and County: Chicago, Cook County

State and Zip Code: Illinois 60601

Phone: 312-814-2546 (office) | 872-276-3643(cell)

E-Mail Address: Benjamin.Jacobson@ilag.gov

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

Street Address: 50 W. Washington St., Room 1508

City and County: Chicago, Cook County

State and Zip Code: 60602

Phone: (312) 603-4808

E-Mail Address: <a href="mailto:CCC.DomRelCR1508@cookcountyilgov">CCC.DomRelCR1508@cookcountyilgov</a>

## 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

## 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

**YOU ARE HEREBY NOTIFIED** That on April 11<sup>th</sup> 2023, I have electronically filed with the United States District Court for the Northern District of Illinois, a motion for entry of default. 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 11<sup>th</sup> 2023.

4////2023
David Martin
5332 S. Princeton
Chicago II, 60609
773-893-0813

E-mail: MartinvThompson@gmail.com

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

## MOTION FOR ENTRY OF DEFAULT

I, David Martin requests that the clerk of court enter default against Attorney

General Kwame Raoul pursuant to Federal Rule of Civil Procedure 55(a). In support of
this request, I rely upon the record in this case and the affidavit submitted herein.

4/11/2023

David Martin 5332 S. Princeton Chicago II, 60609 773-893-0813

E-mail: MartinvThompson@gmail.com

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

# AFFIDAVIT IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT

- I, David Martin, being duly sworn, state as follows:
  - I am the plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter.
  - 2. The complaint was filed on 11/10/2022.
  - A summons was issued for the defendant Attorney General Kwame Raoul on 3/15/2023.
  - The defendant Attorney General Kwame Raoul was served with a copy of the summons and complaint on 3/20/23 (Exhibit A). As reflected on the docket sheet by the proof of service filed on 3/31/2023
  - 5. An answer to the complaint was due on 4/10/2023

- Attorney General Kwame Raoul has failed to appear, plead or otherwise defend within the time allowed and, therefore, is now in default.
- I request that the clerk of court enter default against the defendant Attorney
   General Kwame Raoul

David Martin

5332 S. Princeton

Chicago II, 60609

773-893-0813

E-mail: MartinvThompson@gmail.com

YH CLORE , 202

370G的现在形态中的中心。

OFFICIAL SEAL SABRINA R BAYS

NOTARY PUBLIC, STATE OF ILLINOIS

MY COMMISSION EXPIRES OCT. 02, 2023

## **EXHIBIT A**

4/10/23, 7:28 PM RAOUL, KWAME.htm

**]**star

# SHERIFF'S OFFICE OF COOK COUNTY AFFIDAVIT OF SERVICE

\*03729206\*

CASE NUMBER: 122CV06296 MULT. SER.: 1 DOC. TYPE: SUMMONS

**DIE DATE: 4/5/2023** RECEIVED DATE: 3/16/2023 FILED DATE: 3/15/2023 DIST: 601 DC

**DEFENDANT:** RAOUL, KWAME **PLAINTIFF:** MARTIN, DAVID

100 W RANDOLPH ST ATTORNEY: DAVID MARTIN CHICAGO, IL 60601 5352 S PRINCE

HICAGO, IL 60601 5352 S PRINCETON CHICAGO, IL 60609

ATTACHED FEE AMT: 773-893-0813

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	(5) PROPERTY REC	OVERED: NO	ONE PRESENT	TO RECEIVE ORD	ER OF	COURT. C	RDER POSTE	O IN PLAIN
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	(7) CERTIFIED MA							
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## SHERIFF'S OFFICE OF COOK COUNTY AFFIDAVIT OF SERVICE

\*03729206\*

CASE NUMBER: 122CV06296

**DEFENDANT:** RAOUL, KWAME **PLAINTIFF:** MARTIN, DAVID

DATE DEPUTY STAR #

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

## **ENTRY OF DEFAULT**

I, David Martin request that the clerk of court enter default against defendant Attorney General Kwame Raoul pursuant to Federal Rule of Civil Procedure 55(a). It appearing from the record that the defendant has failed to appear, plead or otherwise defend, the default of defendant Attorney General Kwame Raoul is hereby entered pursuant to Federal Rule of Civil Procedure 55(a).

4////2023
David Martin
5332 S. Princeton
Chicago II, 60609
773-893-0813

E-mail: MartinvThompson@gmail.com

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

## **CERTIFICATE OF SERVICE**

I, David Martin certify that on 4/11/2023, I caused a copy of the Motion for Entry of Default, Affidavit in Support of Motion for Entry of Default and proposed Entry of Default to be placed in a postage-paid envelope addressed to the defendant Attorney General Kwame Raoul at the address 100 W. Randolph St., 12th Fl., Chicago, Illinois 60601. Which is the last known address of the defendant, and deposited said envelope in the United States mail.

4/11/2023
David Martin
5332 S. Princeton
Chicago II, 60609
773-893-0813

E-mail: MartinvThompson@gmail.com