David Martin, )

Plaintiff )

)

) Case 1:22-cv-06296

V. )

)

Attorney General Kwame Raoul )

Judge Gregory Emmett Ahern Jr. )

Unnamed Cook County Clerks )

Cook County )

**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](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.

**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)

**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.

David Martin

5332 S. Princeton

Chicago Il, 60609

773-893-0813

E-mail: MartinvThompson@gmail.com

**EXHIBIT A**