

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION**

DARREN BAILEY,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 3:20-cv-00474
	)	
GOVERNOR JAY ROBERT PRITZKER,	)	
in his own capacity,	)	
	)	
Defendant.	)	

**EMERGENCY MOTION TO REMAND**

DARREN BAILEY by and through his undersigned attorneys, states as follows:

1. On April 23, 2020, Plaintiff filed his action against Defendant in the Circuit Court, Clay County, Illinois under case number 2020-CH-6.
2. After numerous proceedings in the Clay County Circuit Court, on May 21, 2020, Defendant filed his notice of removal of the Clay County action to this Court.
3. As more particularly set forth in Plaintiff's *Memorandum in Support of Emergency Motion to Remand* filed herewith, this matter should be immediately remanded to the Circuit Court, Clay County, Illinois for further proceedings and for disposition.

WHEREFORE, DARREN BAILEY respectfully requests and prays that this Court (a) grant Plaintiff expedited relief, (b) remand this case immediately to the Circuit Court, Clay County, Illinois, and (c) award Plaintiff his attorney fees, costs and expenses associated with his response to the instant Notice of Removal.

Respectfully submitted,

SILVER LAKE GROUP, LTD.

/s/ Steven M. Wallace

By : \_\_\_\_\_

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Counsel to Darren Bailey

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies on the 21<sup>st</sup> day of May, 2020, that a true and correct copy of the above and foregoing pleading was served by electronic filing in the CM/ECF system of the United States District.

/s/Steven M. Wallace \_\_\_\_\_