



May 21, 2020

VIA EMAIL ONLY

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IN RE: GOVERNOR PRITZKER'S NOTICE OF REMOVAL
BAILEY V. PRITZKER, CLAY CO. 2020-CH-6

Gentlemen:

Our office is in receipt of the Governor's Notice of Removal filed by your office as his counsel this morning at 5:53 a.m., on the eve of a hearing on our client's Motion for Summary Judgment before the State Court. When reviewing the facts and circumstances surrounding your most recent filing, the Notice of Removal is nothing more than yet another thinly veiled attempt at forum shopping. This is especially clear following Judge McHaney's denial of the Governor's Motion for Transfer to Sangamon County.

It is clear this attempt at removal is egregious and as such we are in the process of filing an objection along with a request for an emergency hearing to remand the matter back to the State court. Even based on the legal authority your office cites, the complaint in this matter raises not a single federal question. As such, your motion is unequivocally beyond the bounds of frivolous and was filed in bad faith. If the Governor wants to immediately consent to remand to the State Court and agree to proceed with hearing on the Motion for Summary Judgement tomorrow at 1:00 p.m., our office will not file a motion under FRCP 11 seeking sanctions against the Attorney General and the Governor for this blatant attempt at forum shopping.

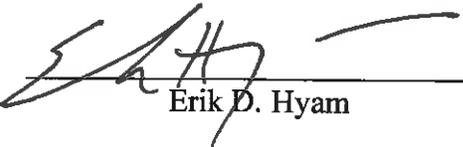
In addition to the imposition of sanctions under FRCP 11 and possibly under IL Supreme Court Rule 137 upon remand, we kindly remind the Attorney General, every attorney signing pleadings on this matter, and the Governor as a licensed attorney, that each is obligated by oath to

defend and protect **ALL** citizens of the State of Illinois, not just the Governor and state actors. Further, each must adhere to the Illinois Supreme Court Rules of Professional Conduct, and specifically to Rules 3.1, 3.2 and 3.3. In addition, the duties imposed by Rule 3.8 serve the office of Attorney General well in this matter.

Please notify our office immediately if the Governor will agree to remand this matter and continue with tomorrow's hearing.

Respectfully,



Thomas G. DeVore

Erik D. Hyam