

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

JEREMY W. LANGLEY, TIMOTHY B.
JONES, and MATTHEW WILSON,

Plaintiffs,

v.

BRENDAN KELLY, in his official capacity
as Director of the Illinois State Police, and
COLE PRICE SHANER, in his official
capacity as State's Attorney of Crawford
County, Illinois,

Defendants.

No. 3:23-cv-192

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that Defendant Brendan Kelly hereby removes the action commenced on January 13, 2023, in the Circuit Court of the Second Judicial Circuit, Crawford County, Illinois, captioned *Jeremy W. Langley, Timothy B. Jones, and Matthew Wilson v. Brendan Kelly and Cole Price Shaner*, No. 2023 CH 2. The complaint is attached as Exhibit 1, and a civil cover sheet is attached as Exhibit 2. All defendants who have been properly joined and served join in or consent to the removal of the action, and this notice is filed within 30 days of Defendant Brendan Kelly's receipt of the complaint. The action is removable pursuant to 28 U.S.C. § 1441(a) because it arises under the Constitution, laws, or treaties of the United States and therefore the Court has original jurisdiction over it pursuant to 28 U.S.C. § 1331. In particular, the action seeks declarations that provisions of Public Act 102-1116, enacted by the General Assembly of Illinois and signed into law by the Governor of Illinois in January 2023, violate the Fourteenth Amendment to the United States Constitution.

Dated: January 23, 2023

Respectfully submitted,

/s/ Darren Kinkead
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CERTIFICATE OF SERVICE

I certify that I will cause to be served a copy of the foregoing *Notice of Removal* via electronic mail upon those listed below on January 23, 2023:

Thomas G. Maag
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/s/ Darren Kinkead
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