

**IN THE CIRCUIT COURT
FOR THE SEVENTH JUDICIAL CIRCUIT OF ILLINOIS
SPRINGFIELD, ILLINOIS**

ANDY MARTIN,)
)
Plaintiff,)
)
v.)
)
WASHINGTON POST COMPANY,)
DANIEL MORSE, SCOTT SHIRLEY d/b/a/)
ADR PRODUCTIONS, GOOGLE , INC.,)
JOHN GILCHRIST, A/K/A JOHN)
BORLAZA, JIM BROSEMER,)
MONTGOMERY COUNTY, MARYLAND,)
JOHN J. MCCARTHY, JOHN DOE)
AGENT OF MARK KIRK and/or BARACK)
HUSSEIN OBAMA, WILLIAM G.)
SIMMONS, EUGENE WOLFE, CHERYL)
MCCALLY,)
)
Defendants.)

Case No. 2009-CH-737


DECLARATION OF WRITTEN CONSENT TO REMOVAL

THOMAS W. KELTY, upon oath, and pursuant to the provisions of 28 USCA § 1446 and FRCP 8(a) and 11 does hereby declare as follows:

1. I am the Attorney for Montgomery County, Maryland, a municipal corporation, and a Defendant herein.
2. Defendant Montgomery County, Maryland does hereby consent to and join in the removal of the above-captioned matter from the Sangamon County (Illinois) Circuit Court to the United States District Court for the Central District of Illinois.
3. I understand that this *Declaration of Written Consent to Removal* will be filed as an exhibit to the Notice of Removal to be filed by Defendant Daniel Morse.

4. Montgomery County, Maryland hereby joins in the Notice of Removal filed herein by Defendant Daniel Morse.
5. Attached hereto is a copy of the summons served upon Defendant Montgomery County, Maryland.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Thomas W. Kelty

Thomas W. Kelty, No. 1441337
Kelty Law Office
Attorney for Defendant
Montgomery County, Maryland
P.O. Box 2243
Springfield, IL 62705
Telephone: 217/789-8901
Facsimile: 217/789-8903

007 57



In The Circuit Court
For The Seventh Judicial Circuit Of Illinois
Springfield, Illinois

705-10

2009CH737

ANDY MARTIN

Case No: _____

VS.

WASHINGTON POST COMPANY, ET AL.

(see attached Exhibit A)

SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the Clerk of this Court, 200 South Ninth Street, Room 405, Springfield, Illinois 62701, within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its date.



SEP - 4 2009

Witness Date, _____

Anthony P. Selig
Clerk of the Court

Deputy Clerk

Attorney Name: Andy Martin, Pro se

Attorney For: _____

Address: 30 E. Huron St., Suite 4406

City/State/Zip Code: Chicago, IL 60611-4723

Telephone: (866) 706-2639

Date of Service: _____
(To be inserted by officer on copy left with defendant or other person)

Form 93

Original (White) Court File (Yellow) Defendant (Pink)

09/09 0:31

EXHIBIT A

[List of additional defendants]

DANIEL MORSE,
SCOTT SHIRLEY
D/B/A/ ADR PRODUCTIONS,
GOOGLE, INC.,
JOHN GILCHRIST
A/K/A JOHN BORLAZA,
JIM BROSEMER,
MONTGOMERY COUNTY,
MARYLAND,
JOHN J. MCCARTHY,
JOHN DOE AGENT OF MARK KIRK
and/or BARACK HUSSEIN OBAMA
WILLIAM G. SIMMONS,
EUGENE WOLFE,
CHERYL MCCALLY

STATE OF ILLINOIS)
)
COUNTY OF SANGAMON) SS.

CERTIFICATE OF SERVICE

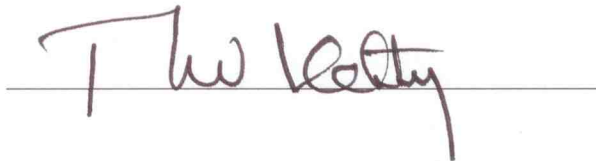
The undersigned hereby certifies pursuant to the provisions of 735 ILCS 5/1-109 (2008 State Bar Edition), and the penalties therein provided, that a copy of the foregoing instrument was served upon each of the addressees hereinafter set forth by placing a copy in an envelope plainly addressed to said addressees, affixing first-class postage thereto, and depositing same with the United States mail at Springfield, Illinois on November 9, 2009:

Andy Martin
30 East Huron Street
Suite 4406
Chicago, IL 60611-4723

David P. Sanders
Wade A. Thomson
JENNER & BLOCK LLP (#40400)
353 N. Clark Street
Chicago, Illinois 60654-3456

Donald M. Craven
Donald M. Craven, P.C.
1005 North Seventh Street
Springfield, Illinois 62702

and that the original was filed with the Clerk of the Court in which this matter is pending.

A handwritten signature in dark ink, appearing to read "T. W. Kelly", is written over a horizontal line.