

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

C.R.W.B. Corporation,	)	
	)	
Plaintiff,	)	Case No. 11-cv-7452
	)	
v.	)	
	)	
The City of Chicago,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Defendant City of Chicago (“City”), by its attorney, Stephen R. Patton, Corporation Counsel, removes the captioned action to this Court pursuant to 28 U.S.C. §§ 1441 and 1446 and in support states:

1. Plaintiff C.R.W.B. Corporation filed this action in the Circuit Court of Cook County, Illinois, County Department, Law Division, Case No. 2011 L 009818, entitled *C.R.W.B. Corporation v. The City of Chicago*.

2. The City was served with summons and a copy of the Complaint on September 22, 2011. A copy of the Summons and Complaint along with its exhibits is attached hereto as Exhibit 1.

3. The Complaint alleges causes of action against the City under the U.S. Constitution. *See Ex. 1, Complaint, Counts I & V.*

4. The City is entitled to remove this action pursuant to 28 U.S.C. § 1441(b), which provides in relevant part that “any civil action of which the district courts have original jurisdiction founded on a claim or right arising under the Constitution, treaties or laws of the United States shall

be removable. . . .” This Notice of Removal is timely under 28 U.S.C. § 1446(b).

5. The Summons and the Complaint with its Exhibits A through C are the only pleadings that Plaintiff has served in this action, and they have been attached to this Notice of Removal. *See* Ex. 1.

6. Promptly after filing this Notice of Removal, the City will file a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County, Illinois, as required by 42 U.S.C. § 1446(d).

Wherefore, the City, by this Notice, removes the above-described action now pending in the Circuit Court of Cook County, Illinois, County Department, Law Division, Case No. 2011 L 009818, entitled *C.R.W.B. Corporation v. The City of Chicago*, to this United States District Court for the Northern District of Illinois, Eastern Division.

Dated: October 20, 2011

Respectfully submitted,

Stephen R. Patton, Corporation Counsel for  
the City of Chicago.

By: /s/ David Graver

MICHAEL DOLESH  
DAVID GRAVER  
City of Chicago Department of Law  
Constitutional and Commercial Litigation Division  
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**CERTIFICATE OF SERVICE**

I, David Graver, an attorney, certify that I served a copy of the foregoing **Notice of Removal** along with its Exhibit 1 on the party listed below by causing it to be placed in the U.S. mail at 30 North LasSalle with proper postage affixed and addressed as shown below before 5:00 p.m. on October 20, 2011.

By: /s/ David Graver

Service List

Joseph J. Siprut  
Siprut PC  
122 South Michigan Avenue  
Suite 1850  
Chicago, IL 60603