

FILED

JUN 15 2016

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

Case No. 16 cv 03627

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Introduction

Petitioner motion for judgment as a matter of law as follows:

1. The state trial court procedurally correctly decided that the respondent must file an answer and appearance by December 5, 2015. Respondent fail to procedurally defend or answer petitioner's complaint.
2. Respondent's doesn't challenge the court order for whether an error occurred or raise newly discovered evidence in this matter therefore; respondent's motion is barred from review pursuant to R 59 (e) and must be denied.
3. Respondent never challenged the final order from the municipal, that wasn't appealed, the only way for re litigation was for a remand from an error or newly discovered evidence from appellate review, rather than defendant re-litigating the transfer that deprives standings to the court's jurisdiction from the lacks off an appeal, pursuant to Article 6 §6 Illinois Constitution.
4. Petitioners request in this matter for the clerk to enter default that arose from federal question under §1983 respondent chooses not to answer, procedurally deprives petitioners privilege to due process of law. This court's jurisdiction depends on §§ 1331: 1343. That petitioner's claims relief in accordance with R. 55 (a) Fed. R. Civ. P. That petitioners claim is in compliance with Rule 8 (a) 1, 2, and 3 Fed. R. Civ. P.
5. Petitioner demands default judgment for request in original complaint for 1, 079,000.00