

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION

Kossiwa Yehouenou,)
)
Plaintiff,)
) No. 11 L 7248
vs.)
)
St. Joseph Hospital,)
Kimberley Darey, M.D.,)
Madhuri Verma, M.D., and)
Defendant(s).)

Plaintiff's Emergency Motion for Judge Eileen Brewer to Cease and Desist The Consistent Pattern and Practice of Abuse Towards Attorney 'Lanre O. Amu or Voluntarily Recuse Herself from Attorney 'Lanre O. Amu's Cases.

Plaintiff's Counsel, 'Lanre O. Amu, moves for Judge Eileen Brewer to Cease and Desist The Consistent Pattern and Practice of Abuse Towards Attorney 'Lanre O. Amu or Voluntarily Recuse Herself from Attorney 'Lanre O. Amu's cases. In support of this motion, 'Lanre O. Amu states as follows:

1. Judge Eileen Brewer, you engage in a pattern of behavior that, in my subjective opinion, is unbecoming of a judge. You undermine my ability to effectively represent my clients, and you play on my intelligence in the manner in which you conduct hearings. With all due respect, the fact that you are a judge does not make you more intelligent than I am. I can see through your improper conduct, and I now ask that they stop. In a fair and just society, the right to a fair and impartial hearing before a fair and impartial judge is sacrosanct. You have no absolute right to preside on my cases. Your right to preside on my cases is premised on the implicit understanding that you will be fair and impartial. With all due respect, without that understanding, you are usurping, and fomenting trouble with me without cause, and you

have no moral or legal right or authority to preside on any of my cases. By bringing this motion, I now ask that this conduct stop.

2. You engage in a pattern of not allowing me to speak freely to bring matters in the case I am handling on behalf of others who hired me to your attention in court. This violates my client's rights and it violates my own rights as an officer of the court also. It is simply an abuse of your position and title as a judge.
3. You manipulate the hearing and the creation of transcribed record by the court reporter to achieve your end by frustrating my attempt to meaningfully make a record or be heard in your courtroom. This violates my client's rights and it violates my own rights also. It is simply an abuse of your position and title as a judge.
4. At your whim, you order the Sheriffs on me to get me out of your courtroom without reasonable cause. Instead of being the victim of your abuse, you manipulate things to now make me look like the unruly trouble maker in your courtroom and setting me up for trouble. There is no just or logical basis for asking armed Sheriffs to get me out of "your courtroom" without having the decency to ask me to get out of your courtroom on my own two feet first. Fairness includes fair warning. Any resistance of the Sheriffs' abrupt orders and encounter could lead to physical altercation, escalation and even gun shots being fired, and criminal charges being brought against me for disorderly conduct, battery of law enforcement officers, or even worse. After criminal charges are brought against me the issue of who actually staged the provocative encounter would have been history, and I will be facing prison and a criminal case at 26th and California. To think I cannot understand this improper conduct and strategy of yours is an insult on my intelligence. This violates my client's rights

and it violates my own rights also. It is simply an abuse of your position and title as a judge.

I now ask that this stop.

5. On April 28, 2011, you held me in contempt of court for no just or apparent reason. I filed a motion asking you to set up a hearing on your contempt charge against me or vacate the contempt. You took my motion under advisement but took no action on it. The cloud created over my head is unwarranted. This violates my client's rights and it violates my own rights also. It is simply an abuse of your position and title as a judge. I have not engaged in the type of conduct that warrants being found in contempt of anything by anyone. If provided with an open forum, I will testify to reaffirm the truth of anything I have written or said at anytime and at any forum. The difficulty you are confronted with is the fact that you cannot argue with the truth. Truth is sacrosanct. Come what may, I will never be intimidated by threat of sanctions or contempt because truth is sacrosanct.
6. We appeared before you on November 8, 2011 for the first time on this case. The complaint in this case was filed on July 13, 2011. Defendant St. Joseph Hospital was served on or about August 12, 2011. All of the defendants in this case are represented by the law firm of Barker and Castro. On November 2, 2011, over two months after the defendants had the complaint, this Court granted the defendants additional 14 days extension of time to answer or otherwise plead. The defendants filed 2-619 motion to dismiss with prejudice on November 2, 2011, I received it on or about November 3, 2011. The motion is 133 pages total, including 10 exhibits. On presentment of the defendant's motion in your courtroom today November 8, 2011, I asked for 28 days to respond in writing to defendants' 2-619 dispositive motion of this medical malpractice case, and you said no. You ordered that I must respond

within 7 days. You will not listen to my reason for asking for 28 days. You said you will dismiss the complaint. You also said that you will grant defendant's Rule 137 motions for sanctions, when no motion for sanctions has been filed. You will not allow me to explain on the record why I need 28 days to respond in writing to a dispositive motion.

7. With all due respect, Judge Brewer, the fact that you are a judge does not make you God. God is fair and impartial. You simply are holding a position of trust and must conduct yourself within the bound of reasonableness, morals, ethics, and the law. You must not needlessly use your authority as a judge to shock or provoke an attorney who appears before you or cause the attorney to stumble in his vocation.
8. Judge Brewer, if this conduct or misconduct does not cease, then, I will have no other recourse but to bring this matter to the attention of the Presiding Judge William Maddux, the Chief Judge Timothy Evans, and the Judicial Inquiry Board. I will formally register my complaint against you with these entities and formally demand that it stop. If nonetheless, the conduct again persists, while mindful of the immunity you have as a judge, I will research and will seek all legal redress against you for all of the harm I have suffered. Your being a judge does not give you the moral right or authority to do any of these things. You are abusing your power and authority as a judge. Please stop. With all due respect but being blunt, I am very sick and tired of your antics, provocations without cause, and staging events to suit your desires. Please stop.

WHEREFORE Plaintiff's Counsel, 'Lanre O. Amu, moves for Judge Eileen Brewer to Cease and Desist The Consistent Pattern and Practice of Abuse Towards Attorney 'Lanre O. Amu or Voluntarily Recuse Herself from Attorney 'Lanre O. Amu's cases.

Respectfully submitted,

/s/ Lanre O. Amu
Lanre O. Amu
Attorney for plaintiff

CERTIFICATION

Under penalties as provided by law pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters therein stated the undersigned certifies as aforesaid that s/he verily believes the same to be true.

<u>/s/ Lanre O. Amu</u>	<u>/s/ Lanre O. Amu</u>	<u>11/8/11</u>
Name	Signature	Date

/s/ Lanre O. Amu
407 S. Dearborn, Suite 1550
Chicago, Illinois 60605
Tel: (312) 922-1221

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NOTICE OF EMERGENCY MOTION

To:
Patricia Barker, Esq.
Barker & Castro
115 South LaSalle Street
Chicago, Illinois 60603
312-855-9300 f312-855-9310

PLEASE TAKE NOTICE that on 11/10/11, at 9:15 a.m., or as soon thereafter as could be heard, plaintiff will appear before the **HONORABLE PRESIDING JUDGE** in Room 2204, at the Richard J. Daley Center in Chicago, Illinois, and there present the following attached motion, a copy of which is hereby served on you.

CERTIFICATE OF SERVICE

I, Lanre Amu, an attorney, certify that I caused a copy of this certificate and the attached document(s) to be served on the above listed party by:

- personal Delivery at the above address
- By fax to 312-855-9310
- depositing a true copy thereof, in a sealed envelope, at the U.S. mail facility located at or about 407 S. Dearborn Street, in Chicago, with proper postage prepaid

on 11/8/11

/s/ Lanre O. Amu
Lanre O. Amu

Lanre O. Amu, #34055
407 S. Dearborn, Suite 1550
Chicago, Illinois 60605
(312) 922-1221

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ORDER

This matter coming to be heard before the Court on Plaintiff's Counsel, 'Lanre O. Amu, moves for Judge Eileen Brewer to Cease and Desist The Consistent Pattern and Practice of Abuse Towards Attorney 'Lanre O. Amu or Voluntarily Recuse Herself from Attorney 'Lanre O. Amu's cases, due notice given, the court advised in the premises,

IT IS ORDERED THAT:

1. Plaintiff's motion is Denied.

ENTER: /s/Eileen Brewer
JUDGE

Date: 11/10/11

'Lanre O. Amu, #34055
407 S. Dearborn, Suite 1550
Chicago, Illinois 60605
Tel: (312) 922-1221