

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

YASMEEN ELAGHA

Plaintiff,

v.

NORTHWESTERN UNIVERSITY PRITZKER
SCHOOL OF LAW, NORTHWESTERN
UNIVERSITY POLICE DEPARTMENT, THE
DAILY SIGNAL MEDIA GROUP, INC. D/B/A
THE DAILY SIGNAL, THE STAR NEWS
NETWORK, a/k/a STAR NEWS DIGITAL
MEDIA, INC, THE CONNECTICUT STAR, THE
TENNESSEE STAR, MELODY MOSTOW,
ANITA KINNEY, HARI OSOFSKY, SUSAN
MICHELLE SPIES ROTH, GEORGE
LANGFORD, ANTHONY KINNETT, JOHN DOE
1-10, JANE DOE 1-10

Defendants.

CIVIL ACTION FILE NO.: 24-cv-12066

NOTICE OF REMOVAL

Defendants, Northwestern University Pritzker School of Law and Northwestern University Police Department¹ (collectively, “Northwestern”), by and through undersigned counsel, hereby file this Notice of Removal pursuant to 28 U.S.C. §§ 1331, 1441, and 1446. The grounds for removal are as follows:

1. Plaintiff Yasmeen Elagha commenced this action by filing a Complaint in the Circuit Court of Cook County on November 15, 2024. A copy of the Complaint is attached hereto as Ex. A.

¹ Neither Northwestern University Pritzker School of Law or Northwestern University Police Department are legal entities capable of being sued. Northwestern University intends to file a motion to substitute itself as the correct party in interest.

2. The state court action is captioned Yasmeen Elagha v. Northwestern University Pritzker School of Law et al., Case Number 2024L012887 (the “Action”).

3. Northwestern has not yet been served by Plaintiff. This Notice of Removal is accordingly timely under 28 U.S.C. § 1446(b).

4. The Complaint asserts claims under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.* and “Title VII of the Civil Rights Act,” in addition to various state law claims.

5. Under 28 U.S.C. § 1441, “any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or defendants, to the district court of the United States for the district and division embracing the place where such action is pending.” 28 U.S.C. § 1441(a).

6. Pursuant to 28 U.S.C. § 1331, which provides for federal question jurisdiction, the “district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

7. Because this Action arises under federal statutes, this Court has original jurisdiction over this Action and this Action is properly removed to this Court pursuant to 28 U.S.C. §§ 1331 and 1441(c). To the extent that Plaintiff’s Complaint asserts state law claims against Northwestern, this Court has supplemental jurisdiction over such claims under 28 U.S.C. § 1367.

8. A true and correct copy of this Notice is being filed promptly with the Clerk of the Circuit Court of Cook County, pursuant to 28 U.S.C. § 1446(d).

9. Written notice of the filing of this Notice will be served promptly on the Plaintiff, pursuant to 28 U.S.C. § 1446(d), as reflected in the attached certificate of service.

10. By removing this action the Northwestern does not waive any defenses available to it or admit any of the allegations in the Complaint.

WHEREFORE, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Northwestern respectfully removes this civil action from the Circuit Court of Cook County to the United States District Court for the Northern District of Illinois.

Respectfully submitted this 22nd day of November, 2024.

**Northwestern University Pritzker School of Law
and Northwestern University Police Department**

s/ Casey Grabenstein

One of their attorneys

Casey Grabenstein (casey.grabenstein.com)
Saul Ewing LLP
161 North Clark Street, Suite 4200
Chicago, Illinois 60601
(312) 876-7100

Joshua W. B. Richards (joshua.richards@saull.com)
pro hac vice forthcoming
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102
(215) 972-7737
Joshua.Richards@saull.com

*Attorneys for Defendants Northwestern University
Pritzker School of Law and Northwestern
University Police Department*

CERTIFICATE OF SERVICE

I hereby certify that on this date I have electronically filed the foregoing **NOTICE OF REMOVAL** with the Clerk of Court using the CM/ECF system and served the same upon Plaintiff's counsel via United States First Class Mail properly addressed as follows:

WALEED NASER
155 N. Wacker Dr. Suite 4250
Chicago, IL 60606

FARAH CHALISA
155 N. Wacker Dr. Suite 4250
Chicago, IL 60606

AHMAD ZAHER
ADVANTA LAW FIRM, PLC
24300 Southfield Road, Suite 210,
Southfield, MI 48075

SHIRAZ K. KHAN
THE SHIRAZ LAW FIRM, PLLC.
30400 Telegraph Rd. Suite 380
Bingham Farms, MI. 48025

This 22nd day of November, 2024.

s/ Casey Grabenstein