

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

VILLAGE OF SHILOH,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:21-CV-00807-MAB
)	
NETFLIX, INC., et al.)	
)	
Defendants.)	

PLAINTIFF VILLAGE OF SHILOH’S MOTION TO REMAND

Plaintiff, Village of Shiloh, with respect moves this Court to remand the above case to the 20th Judicial Circuit of St. Clair County, Illinois. Defendant Netflix, Inc., removed this matter on July 15, 2021, alleging federal jurisdiction under the Class Action Fairness Act on 2005 (“CAFA”). All other Defendants have since joined in or consented to removal. Pursuant to 28 U.S.C. § 1447, and for the reasons set forth in the accompanying memorandum in support, Village of Shiloh moves to remand this matter back to state court.

WHEREFORE, Village of Shiloh prays this Court will enter an order remanding this matter to the 20th Judicial Circuit of St. Clair County, Illinois.

By: /s/ Thomas H. Geoghegan
 One of Plaintiff’s Attorneys
 Thomas H. Geoghegan
 Michael P. Persoon
 Will Bloom
 Despres, Schwartz & Geoghegan, Ltd.
 77 West Washington Street, Suite 711
 Chicago, Illinois 60602
 (312) 372-2511
tgeoghegan@dsgchicago.com
mpersoon@dsgchicago.com
wbloom@dsgchicago.com

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2021, a true and correct copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system.

/s/ Thomas H. Geoghegan _____