

EXHIBIT L

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PAUL DUFFY, <i>et al</i> ,)	Case No. 1:13-cv-01569
)	
Plaintiffs,)	Removed from:
)	
v.)	The Circuit Court of Cook County, IL
)	Case No. 13-L-001656
)	
PAUL GODFREAD, ALAN COOPER)	Consolidated with Case No. 1:13-cv-04341
and JOHN DOES 1-10,)	
)	
Defendants.)	
)	

DECLARATION OF ERIN KATHRYN RUSSELL

1. My name is Erin Kathryn Russell. I am over the age of 21 and competent to execute this Declaration.
2. The statements made herein are based upon my personal knowledge.
3. I am an attorney licensed to practice in the states of Illinois and Georgia. I am admitted to practice in this Court, as well as the Central District of Illinois, Southern District of Illinois, Eastern District of Wisconsin, Western District of Wisconsin, Northern District of Georgia and Middle District of Georgia.
4. I represent Defendants Paul Godfread and Alan Cooper in the above-captioned consolidated civil action.
5. Plaintiff Paul Duffy originally filed his claims against Mr. Godfread and Mr. Cooper in the Circuit Court of Cook County, Law Division. It was assigned case number 13-L-001656. I never appeared in that matter on behalf of Mr. Godfread or Mr. Cooper. The only filing I made in the Law Division case was a Notice of Removal.
6. Prenda Law, Inc. originally filed its claims against Mr. Godfread and Mr. Cooper in St. Clair County, Illinois. It was assigned case number 13-L-75. I never appeared in that matter on behalf of Mr. Godfread or Mr. Cooper. The only filing I made in the St. Clair County case was a Notice of Removal.
7. I never appeared for Defendants Godfread and Cooper in the St. Clair County case.
8. I received an email from Paul Duffy on March 1, 2013 in which he alleged that an amended complaint existed that destroyed diversity jurisdiction for the Southern District of Illinois case.

9. I have litigated other cases in which Mr. Duffy was opposing counsel.
10. Based on my personal experience with Mr. Duffy's reputation for truthfulness and the thoroughness of his legal work, I elected to investigate the alleged amended complaint prior to making any decision about whether to allow the case to be remanded to St. Clair County, Illinois.
11. My investigation, conducted with the assistance of Laura Beasley, my local counsel in St. Clair County, Illinois, revealed that the amended complaint forwarded to me by Mr. Duffy was not valid.
12. At my behest, Ms. Beasley facilitated the execution of the affidavit of Judy Kent.
13. I did not have the amended complaint, nor did I know any such document existed, prior to removing the Prenda case from St. Clair County to the Southern District of Illinois.
14. If I had known about the amended complaint, and the circumstances under which it was filed and served, my analysis of diversity jurisdiction would have remained the same based on the governing case law and I would have removed the case to the Southern District in good faith.

I declare under penalty of perjury, under the laws of the United States of America and the State of Illinois that the foregoing is true and accurate, and based upon my personal knowledge.

Executed September 9, 2013 at Chicago, Illinois.



Erin Kathryn Russell