

behalf of a class of, “[a]ll persons who paid an inflated price for food items by purchasing an Extra Value Meal in Illinois.” *See* Exhibit B ¶ 24. Thus, the class definition is not limited to Illinois citizens; it encompasses all purportedly “inflated” purchases of EVMs in the state of Illinois, regardless of where the purchaser was domiciled.

REMOVAL IS TIMELY

3. Although plaintiff commenced this action in state court on December 22, 2016, the summons and complaint were not served on McDonald’s agent for accepting process until January 4, 2017. This notice of removal was filed within thirty days of that service and, therefore, is timely under 28 U.S.C. § 1446(b).

PAPERS FROM REMOVED ACTION ARE ATTACHED

4. As required by 28 U.S.C. § 1446(a), a copy of the summons is attached hereto as Exhibit A, a copy of the complaint is attached hereto as Exhibit B, and a copy of plaintiff’s motion for class certification is attached hereto as Exhibit C. Exhibits A through C comprise all “process, pleadings and orders” that have been served upon McDonald’s in this action.

VENUE IS PROPER

5. Venue is proper under 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district and division embracing the place where the state-court action was pending.

THIS COURT HAS JURISDICTION UNDER “CAFA”

6. The Class Action Fairness Act of 2005 (“CAFA”) amended 28 U.S.C. § 1332(d) to confer federal jurisdiction over class action lawsuits involving at least 100 members where there is more than \$5 million in controversy, exclusive of interest and costs, and minimal

diversity exists (*i.e.*, any defendant and any putative class member have different state citizenships). The present action satisfies these requirements.

7. First, plaintiff has pled that the putative class for her claims against McDonald's is comprised of "hundreds of Class members." *See* Exhibit B ¶ 32. Thus, the requirement for CAFA jurisdiction that the class contain at least 100 members is satisfied.

8. Second, although McDonald's does not admit the allegations in plaintiff's complaint and denies any wrongdoing or liability whatsoever, the aggregate amount placed in controversy by the claims of plaintiff and her proposed class, apart from interest and costs, exceeds \$5 million. Plaintiff is seeking to recover for all EVM sales in Illinois that occurred at allegedly "inflated" prices. *Id.* ¶ 24. Her class definition does not contain any date restriction, but the statute of limitations under the ICFA is three years. 815 ILCS 505/10a(e). During the three years preceding the filing of plaintiff's complaint—from December 22, 2013 to December 21, 2016—293,764,035 EVMs were sold in the state of Illinois. If all of these EVMs were priced eleven cents more than their *a la carte* components, which is what plaintiff alleges regarding her EVM purchase (*see* Exhibit B ¶ 23), the aggregate alleged damages for the putative class would exceed \$32 million. Moreover, plaintiff has included in her complaint a prayer for punitive damages (*see id.* at 12(F)), which places even more money in controversy. Thus, the amount-in-controversy requirement for CAFA jurisdiction is satisfied.

9. Third, and finally, the parties are minimally diverse because numerous members of plaintiff's proposed class have different state citizenships than McDonald's. Defendant McDonald's is incorporated under the laws of the state of Delaware and has its principal place of business in the state of Illinois. Thus, for diversity of citizenship purposes, McDonald's is a citizen of both Illinois and Delaware. And, although plaintiff Killeen claims to be a citizen of

Illinois (*id.* ¶ 10), many individuals in her proposed class are domiciled in states other than Illinois and Delaware.

10. There are 667 McDonald's restaurants in the state of Illinois. The categories of customers who are certain to have purchased EVMs from those restaurants in the past three years include: (1) customers from all over the United States passing through Illinois along more than 2,185 miles of interstate highways; (2) customers from all over the United States flying in and out of the 107 public and private airports located in Illinois; (3) undergraduate and graduate students who temporarily reside in Illinois while attending one of more than 100 colleges and universities in the state, but are actually citizens of other states; (4) customers who are domiciled in neighboring states, such as Indiana, Wisconsin, Iowa and Missouri; (5) commuters; (6) tourists and out-of-town visitors; and (7) foreign nationals. Because these citizens of states other than Illinois and Delaware purchased EVMs in Illinois and, therefore, are included in plaintiff's class, the requirement of minimal diversity for CAFA jurisdiction is satisfied.

NOTICE TO STATE COURT AND ADVERSE PARTY

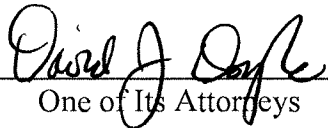
11. Pursuant to 28 U.S.C. § 1446(d), McDonald's will promptly serve a copy of this Notice of Removal on plaintiff's counsel and file a copy of the notice with the Clerk of the Circuit Court of Cook County, Illinois.

WHEREFORE, Defendant McDonald's Corporation prays that the above-described action in the Chancery Division of the Circuit Court of Cook County, in the State of Illinois, be removed to this Court and that further proceedings be conducted in this Court as provided by law.

Dated: February 2, 2017

Respectfully submitted,

McDONALD'S CORPORATION

By: 
One of Its Attorneys

David J. Doyle
David J. Ogles
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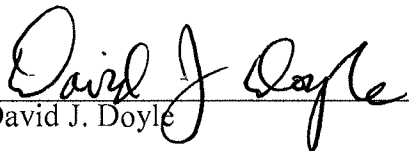
Counsel for McDonald's Corporation

CERTIFICATE OF SERVICE

I, David J. Doyle, an attorney on oath, state that on February 2, 2017, I caused this Notice of Removal to be filed on the Court's ECF system and served this Notice of Removal by U.S. First Class Mail, postage prepaid, upon the following counsel of record (in addition to serving it by electronic mail on Mr. Sobek):

Samuel A. Shelist
Shelist Law Firm LLC
29 East Madison Street, Suite 1000
Chicago, Illinois 60602

Jeffrey Sobek
JS Law
29 East Madison Street, Suite 1000
Chicago, Illinois 60602
jeffs@jsslawoffices.com



David J. Doyle

EXHIBIT A



CORPORATION SERVICE COMPANY®

Notice of Service of Process

null / ALL
Transmittal Number: 16069916
Date Processed: 01/05/2017

Primary Contact: SOP CSC MCD
McDonald's Corporation
Campus Office Building
2915 Jorie Blvd.
Oak Brook, IL 60523

Entity:	McDonald's Corporation Entity ID Number 0537858
Entity Served:	McDonald's Corporation
Title of Action:	Kelly Killeen vs. Mcdonald's Corporation
Document(s) Type:	Summons/Complaint
Nature of Action:	Class Action
Court/Agency:	Cook County Circuit Court, Illinois
Case/Reference No:	2016-CH-16519
Jurisdiction Served:	Illinois
Date Served on CSC:	01/04/2017
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Samuel A. Shelist 312-644-3900

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscglobal.com

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

KELLY KILLEEN

v.

MCDONALD'S CORPORATION; SALABAD, LLCNo. 2016-CH-16519

Defendant Address:

MCDONALD'S CORPORATIONR/A PRENTICE HALL CORPORATION801 ADLAI STEVENSON DRIVESPRINGFIELD, IL 62703☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- ☒ Richard J. Daley Center, 50 W. Washington, Room 802, Chicago, Illinois 60602
- | | | |
|--|--|--|
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid 1500
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60428 | <input type="checkbox"/> Richard J. Daley Center
50 W. Washington, LL-01
Chicago, IL 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

☐ Atty. No.: 43236Name: SHELST LAW FIRM LLCAtty. for: KELLY KILLEENAddress: 29 E MADISON#1000City/State/Zip Code: CHICAGO, IL 60606Telephone: (312) 644-3900Primary Email Address: jeffs@jsslawoffices.com

Secondary Email Address(es):

~~lpena@jsslawoffices.com~~

Witness:

Thursday, 22 December 2016

DOROTHY BROWN, Clerk of Court

Date of Service: JANUARY 4, 2017

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED

2016 DEC 22 PM 2: 36

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

CLERK

DOROTHY BROWN

KELLY KILLEEN,)	
Individually and on behalf all others similarly situated,)	
)	Class Action
Plaintiff,)	
)	No. 2016-CH-16519
v.)	
)	Calendar 06
MCDONALD'S CORPORATION and)	
SALABAD, LLC,)	Judge Celia G. Gamrath
)	
Defendants.)	

MOTION FOR CLASS CERTIFICATION

Plaintiff, Kelly Killeen ("Killeen" or "Plaintiff"), individually and on behalf of all others similarly situated, by and through her attorneys, respectfully submits this motion for class certification.

In support of this motion, Plaintiff states the following:

1. Plaintiff's Class Action Complaint seeks to represent two classes of similarly situated consumers to redress the pervasive pattern of fraudulent, deceptive and otherwise improper advertising, sales and marketing practices that Defendants continue to engage in regarding certain of their Extra Value Meals®, In reality, certain of McDonalds' Extra Value Meals are not a value because they are more expensive than purchasing separately each of the items that comprise the Meals.

2. Plaintiff seeks to represent the following classes:

McDonald's Class: All persons who paid an inflated price for food items by purchasing an Extra Value Meal from a MCDONALD'S® store in Illinois.

Salabad Class: All persons who paid an inflated price for food items by purchasing a MCDONALD'S® Extra Value Meal at the MCDONALD'S® Store #6491 at 36 W. Randolph, Chicago, Illinois.

3. Relevant facts in support of class certification are included in Plaintiff's Class Action Complaint, and are incorporated herein as if separately stated herein.

4. Defendants' schemes and artifices to defraud Plaintiff and other members of the proposed Class consist of systemic and continuing practices of disseminating false and misleading information via television commercials, Internet websites and postings, point of purchase advertisements and national print advertisements, all of which are intended to trick unsuspecting consumers, including Plaintiff and other members of the proposed Class, into believing that they are receiving a value by purchasing one of the Meals rather than purchasing each item in the Extra Value Meal separately.

5. Through this massive marketing campaign, Defendants have conveyed one message about these Extra Value Meals, inherent in the name: "Extra Value Meals" are actually a value compared to purchasing the items separately. Each person who has purchased an Extra Value Meal, including the Plaintiff, has been exposed to Defendant's misleading advertising message and purchased those Extra Value Meals as a result of that advertising.

6. Common questions of law and fact exist as to all class members and predominate over any questions that affect only individual class members.

7. The questions of law and fact that are common to both classes and that predominate include, but are not limited to:

- a. whether Defendants represented that a certain Extra Value Meals were a value;
- b. whether Defendants failed to disclose that certain Extra Value Meals were more expensive than purchasing the included items a la carte;
- c. whether Defendants' claims regarding certain Extra Value Meals are deceptive or misleading;
- d. whether Defendants engaged in false, deceptive and/or misleading

advertising;

- e. whether Defendants' conduct as alleged herein violates the consumer fraud statute of Illinois
- f. whether Defendants' conduct as alleged herein violates public policy;
- g. whether Plaintiff and Class members have sustained monetary loss and the proper measure of that loss;
- h. whether Plaintiff and Class members are entitled to declaratory and injunctive relief; and
- i. whether Defendants were unjustly enriched.

8. Plaintiff will fairly and adequately protect the interests of the class in that Plaintiff's claims are typical of those classes and Plaintiff does not have any interests which are adverse to the other class members.

9. Plaintiff has retained competent counsel experienced in handling class actions. Neither Plaintiff nor her counsel have any interests which might cause her not to vigorously prosecute this action.

10. As illustrated above, Plaintiff's claims are based on similar facts and the same legal theories as those of the class members.

11. Class action treatment is superior to the alternatives, if any, for the fair and efficient adjudication of the controversy described herein because it permits a large number of injured persons to prosecute their common claims in a single forum simultaneously, efficiently, and without duplication of evidence and effort. Class treatment is especially appropriate for the current controversy because it is the only practical means for class members to receive redress given that the individual claims are small in amount.

12. Upon information and belief, both classes comprise hundreds of consumers, and are so numerous that joinder of all members of the Class is impracticable. While the exact

number of Class members is presently unknown and can only be ascertained through discovery, Plaintiff believes that there are hundreds of Class members based upon the fact that MCDONALD'S® is one of the largest restaurant chains in Illinois and Store #6491 serves thousands of people every day.

13. Plaintiff will file a Memorandum of Law in support of this motion as soon as practicable as permitted by this Honorable Court.

WHEREFORE, for the foregoing reasons, and for the reasons to be stated in her forthcoming Memorandum of Law, Plaintiff respectfully requests that this Court grant this motion and certify the classes defined above, appoint the named plaintiff as class representative of the class, and appoint her attorneys as class counsel.

Dated: December 22, 2016

Respectfully submitted,

KELLY KILLEEN, individually and on behalf of all others
similarly situated,

By: /s/ Samuel A. Shelist
One of her attorneys

Attorney No. 43236
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 CIRCUIT COURT OF
 COOK COUNTY, ILLINOIS
 CHANCERY DIVISION
 CLERK DOROTHY BROWN

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, CHANCERY DIVISION**

KELLY KILLEEN,)	
Individually and on behalf all others similarly situated,)	
)	
Plaintiff,)	
)	No.
v.)	
)	Class Action
MCDONALD'S CORPORATION and)	
SALABAD, LLC,)	
)	
Defendants.)	

CLASS ACTION COMPLAINT

NOW COMES Plaintiff Kelly Killeen ("Plaintiff"), individually, and on behalf of all others similarly situated, by and through counsel, and for her complaint against McDonald's Corporation (McDonald's) and Salabad, LLC ("Salabad, LLC") (McDonald's and Salabad are collectively "Defendants"), states as follows:

Nature of the Case

1. Plaintiff brings this action individually and on behalf of a proposed class (the "McDonald's Class"), as more fully defined below, of similarly situated consumers throughout Illinois against McDonalds to redress the pervasive pattern of fraudulent, deceptive and otherwise improper advertising, sales and marketing practices that McDonald's continues to engage in regarding certain of its Extra Value Meals®, including its Two Cheeseburger Extra Value Meal and Sausage Burrito(2) Extra Value Meal. In reality, certain of McDonalds' Extra Value Meals are not a value because they are more expensive than purchasing off the a la carte menu each of the items that comprise the Meals.

2. Plaintiff also brings this action individually and on behalf of a proposed class (the “Salabad Class”), as more fully defined below, of similarly situated consumers of the McDonald’s store #6491 located at 36 W. Randolph, Chicago, Illinois, to redress the pervasive pattern of fraudulent, deceptive and otherwise improper advertising, sales and marketing practices that Salabad continues to engage in regarding certain of its Extra Value Meals, including its Sausage Burrito(2) Extra Value Meal. In reality, certain of Defendants’ are not a value because they are more expensive than purchasing each of the items that comprise the Meals.

3. As more fully alleged herein, Defendants’ schemes and artifices to defraud Plaintiff and other members of the proposed Class consist of systemic and continuing practices of disseminating false and misleading information via television commercials, Internet websites and postings, point of purchase advertisements and national print advertisements, all of which are intended to trick unsuspecting consumers, including Plaintiff and other members of the proposed Class, into believing that they are receiving a value by purchasing one of the Meals rather than purchasing each item in the Extra Value Meal separately.

4. MCDONALD’S® and EXTRA VALUE MEAL® are registered trademarks of McDonald’s. The MCDONALD’S® brand franchise is the world’s largest foodservice retailer, with more than 14,000 locations in the United States and serving more than one billion pounds of beef per year in the United States.

5. Defendants heavily market the Extra Value Meal® as being a value. This is reinforced in Defendant’s marketing campaigns, which includes its current advertising for its Extra Value Meal on its website, which states:

EXTRA VALUE MEAL

You value food just as much as you value a good price. Thanks to our delicious meal bundles, you can have both. A meal with quality ingredients that's easy on the wallet? That's a great deal.

6. However, some of the Extra Value Meals at certain MCDONALD'S® stores are actually more expensive than purchasing the items separately.

7. Defendants' comprehensive advertising campaign for Extra Value Meal has been extensive, and Defendants have spent a significant amount of money to convey deceptive messages to consumers throughout the United States. Defendants utilize a wide array of media to convey their deceptive claims about the Extra Value Meal, including television, magazines, and the Internet. Through this massive marketing campaign, Defendants have conveyed one message about these Extra Value Meals, inherent in the name: "Extra Value Meals" are actually a value compared to purchasing the items separately. Each person who has purchased an Extra Value Meal, including the Plaintiff, has been exposed to Defendant's misleading advertising message and purchased those Extra Value Meals as a result of that advertising.

8. Plaintiff brings this action on behalf of herself and other similarly situated consumers to halt the dissemination of these false and misleading advertising messages, correct the false and misleading perception that they have created in the minds of consumers, and obtain redress for those who have purchased Extra Value Meals from Defendants.

9. Plaintiff alleges violations of the consumer fraud statutes of the state of

Illinois, as well as unjust enrichment under the laws of the state of Illinois.

The Parties

10. Plaintiff Killeen is, and at all time relevant to this action has been, a resident and citizen of Illinois.

11. Plaintiff was repeatedly exposed to and saw Defendants' advertisements and representations regarding the McDonald's Extra Value Meals in Illinois. After seeing Defendant's advertising regarding the Extra Value Meal, Plaintiff purchased a Sausage Burrito (2) Extra Value at the MCDONALD'S® restaurant, Store #6491, owned by Salabd, LLC, located at 36 W. Randolph, Chicago, Illinois.

12. Plaintiff purchased the Sausage Burrito (2) Extra Value in reliance on the misrepresentations and omissions of the Defendants. Plaintiff suffered an injury in fact and lost money as a result of the deceptive and unfair conduct described herein, because the Extra Value Meal that she purchased was more expensive than if she had purchased the items that comprised the meal separately, in other words the Meal was not a value.

13. Defendant McDonald's is a corporation incorporated in the State of Illinois, and has its principal place of business in Oak Brook, Illinois.

14. Defendant Salabad, LLC is a private corporation incorporated in the State of Illinois and its principal office is in Northfield, Illinois. Salabad, LLC is the franchisee of Store #6491, located at 36 W. Randolph, Chicago, Illinois.

15. McDonald's, as the franchisor of MCDONALD'S® restaurants, is in the business of promoting, marketing, distributing and selling MCDONALD'S Extra Value Meals® throughout the United States, including to millions of consumers nationwide, through MCDONALD'S® brand restaurants. Although MCDONALD'S® restaurants are

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owned and/or operated by franchisees, McDonald's creates, maintains and enforces strict uniform standards and practices for all aspects of its MCDONALD'S® restaurants.

16. Upon information and belief, McDonald's has the right of complete or substantial control over all MCDONALD'S® restaurants in that it could implement and direct the policies and procedures of those restaurants as well as dictate the restaurants' appearance, equipment, menu, hours of operation, employees' appearance and demeanor, and marketing and advertising. McDonald's complete or substantial control caused many MCDONALD'S® stores throughout Illinois to charge as much or more for certain Extra Value Meals than if the items were ordered a la carte, including Store# 6818 (23 N. Western Ave, Chicago), Store# 18236 (40 West Main St., Albion), Store # 11009 (1212 W. Main St., Fairfield), Store# 2887 (1304 N. Keller Dr., Effingham) and Store #25192 (2911 S. Banker, Effingham). McDonald's deceptive and unfair practices occurred throughout the United States, including Store#31491 (Atlanta, Georgia).

17. Further, Defendant and its franchisees hold themselves out to the general public as one company—MCDONALD'S®—as evidenced by the fact that the advertising materials, signs, and store appearance all are uniform and identify McDonald's franchisees' restaurants as MCDONALD'S®.

Jurisdiction and Venue

18. Jurisdiction and venue are proper in this Court because this action arose out of:
(i) business transacted by Defendants in Cook County, Illinois.

Facts Common to All Counts

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19. Defendants engage in an extensive, nationwide advertising and marketing campaign of its Extra Value Meals, consisting of print, television, Internet-based media and in-store advertisements.

20. Defendant's advertisements relating to Extra Value Meals are intended to convey to consumers that the meal is less expensive than purchasing the items individually.

21. Indeed, a customer who purchases an Extra Value Meal receives the same items that someone who orders each item individually would receive, but pays more for those items.

22. Defendant's statements regarding Extra Value Meals, in conjunction with the impression regarding the value received by ordering a meal rather than each item individually intended to convey by naming and promoting them as Extra Value Meals, were false, deceptive and misleading. Plaintiff and the proposed Class members purchased Extra Value Meals in reliance on the foregoing uniform misrepresentations and omissions of the Defendants.

23. Plaintiff purchased the Sausage Burrito (2) Extra Value Meal at Store #6491, owned by Salabd, LLC, located at 36 W. Randolph, Chicago, Illinois. The cost of the Sausage Burrito Extra Value Meal was \$5.08; whereas, if she had purchased the 2 burritos, hash brown and medium coffee from the a la carte menu, the cost would have been \$4.97.

Class Action Allegations

24. Plaintiff brings this lawsuit, both individually and as a class action on behalf of similarly situated purchasers of the MCDONALD'S® Extra Value Meal®, pursuant to 735 ILCS 5/2-801. The proposed Classes are defined as:

McDonald's Class: All persons who paid an inflated price for food items by purchasing an Extra Value Meal in Illinois.

Salabad Class: All persons who paid an inflated price for food items by purchasing an Extra Value Meal at Store #6491 at 36 W. Randolph, Chicago, Illinois.

Excluded from the proposed Classes are Defendants, its respective officers, directors and employees, any entity that has a controlling interest in Defendants, and all of their respective employees, affiliates, legal representatives, heirs, successors, or assignees. Any claims for personal injury or consequential damages, not otherwise permitted under the facts pled herein, are expressly excluded from this action. Plaintiff reserves the right to amend the Class definitions as necessary.

25. On information and belief, class members are so numerous that individual joinder of all members is impractical, and while the exact number of the class members is unknown at the present time, it is ascertainable by appropriate discovery.

26. Common questions of law and fact exist as to all class members and predominate over any questions that affect only individual class members.

27. The questions of law and fact that are common to both classes and that predominate include, but are not limited to:

- a. whether Defendants represented that a certain Extra Value Meals were a value;
- b. whether Defendants failed to disclose that certain Extra Value Meals were more expensive than purchasing the included items a la carte;
- c. whether Defendants' claims regarding certain Extra Value Meals are deceptive or misleading;
- d. whether Defendants engaged in false, deceptive and/or misleading advertising;
- e. whether Defendants' conduct as alleged herein violates the consumer fraud statute of Illinois

- f. whether Defendants' conduct as alleged herein violates public policy;
- g. whether Plaintiff and Class members have sustained monetary loss and the proper measure of that loss;
- h. whether Plaintiff and Class members are entitled to declaratory and injunctive relief; and
- i. whether Defendants were unjustly enriched.

28. Plaintiff will fairly and adequately protect the interests of the class in that Plaintiff's claims are typical of those classes and Plaintiff does not have any interests which are adverse to the other class members.

29. Plaintiff has retained competent counsel experienced in handling class actions. Neither Plaintiff nor their counsel have any interests which might cause them not to vigorously prosecute this action.

30. Plaintiff's claims are based on similar facts and the same legal theories as those of the class members.

31. Class action treatment is superior to the alternatives, if any, for the fair and efficient adjudication of the controversy described herein because it permits a large number of injured persons to prosecute their common claims in a single forum simultaneously, efficiently, and without duplication of evidence and effort. Class treatment is especially appropriate for the current controversy because it is the only practical means for class members to receive redress given that the individual claims are small in amount.

32. Upon information and belief, the Class comprise hundreds of consumers, and is so numerous that joinder of all members of the Class is impracticable. While the exact number of Class members is presently unknown and can only be ascertained through

discovery, Plaintiff believes that there are hundreds of Class members based upon the fact that MCDONALD'S® is one of the largest restaurant chains in Illinois and Store #6491 serves thousands of people every day.

33. Plaintiff's claims are typical of the claims of the proposed Class, and Plaintiff will fairly and adequately represent and protect the interests of the proposed Classes. Plaintiff does not have any interests antagonistic to those of the proposed Class. Plaintiff has retained competent counsel experienced in the prosecution of this type of litigation. The questions of law and fact common to the proposed Class members, some of which are set out above, predominate over any questions affecting only individual Class members.

34. A class action is superior to other available methods for the fair and efficient adjudication of this controversy. The expense and burden of individual litigation would make it impracticable or impossible for proposed Class members to prosecute their claims individually. The trial and the litigation of Plaintiff's claims are manageable.

35. Unless a class is certified, Defendant will retain monies received as a result of its conduct that was wrongfully taken from Plaintiff and proposed Class members. Unless an injunction is issued, Defendant will continue to commit the violations alleged, and the members of the proposed Class and the general public will continue to be misled.

36. Defendant has acted and refuses to act on grounds generally applicable to the proposed Class, making appropriate final injunctive relief with respect to the proposed Class as a whole.

COUNT I
**(Violation of the Illinois Consumer Fraud and Deceptive Trade Practices Act
Against McDonald's)**

37. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with

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the same force and effect as though fully set forth herein.

38. Plaintiff brings Count I individually, and on behalf of all similarly situated, against McDonald's pursuant to the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 501/1 *et seq.*;

39. McDonald's foregoing misrepresentations and omissions regarding the value of certain Extra Value Meal are deceptive and/or unfair acts or practices prohibited by the consumer fraud statute set forth above.

40. McDonald's intended to be deceptive and/or unfair to Plaintiff and the proposed Class by intentionally making the foregoing false and misleading statements and omitting accurate statements as alleged above, because had Defendants provided accurate information, Plaintiff and the proposed Class members would not have purchased the Extra Value Meal.

41. McDonald's practice of creating, approving and distributing advertising for Extra Value Meals that contained false and misleading information for the purpose of selling them to Plaintiff and the proposed Class, as alleged in detail *supra*, is both an unfair act and deceptive practice prohibited by the foregoing statute.

42. McDonald's intended to be deceptive and unfair to Plaintiff and the proposed Class by unlawfully representing that each of MCDONALD'S® Extra Value Meal is a value compared to purchasing the items a la carte. McDonald's intent is evidenced by the common understating and expectation of a meal advertised as a value.

43. McDonald's intended that Plaintiff and the proposed Class members rely on McDonald's misrepresentations as to the value of the Extra Value Meals when purchasing them, and McDonald's omitted to disclose to or notify Plaintiff and the proposed

Class that certain Extra Value Meals were more costly than purchasing the items a la carte.

44. Plaintiff and the proposed Class members justifiably relied on the misrepresentations and omissions to their detriment by purchasing the Extra Value Meals after seeing MCDONALD'S® advertising. Indeed, McDonald's made no attempt to inform consumers that certain Extra Value Meals are more expensive.

45. Had Plaintiff and the proposed Class members known the truth, they would not have purchased certain Extra Value Meal; rather, they would have purchased each item separately.

46. The above-described deceptive and unfair acts and practices were used or employed in the conduct of trade or commerce, namely, the sale of the Extra Value Meals to Plaintiff and the proposed Class members.

47. The above-described deceptive and unfair acts offend public policy and cause substantial injury to consumers.

48. As a direct and proximate result of the foregoing, the Plaintiff and Class members have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, prays for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth in 735 ILCS 5/2-801, and certifying the McDonald's Class defined herein;
- B. Designating Plaintiff as representative of the McDonald's Class, and her undersigned counsel as Class Counsel;
- C. Entering judgment in favor of Plaintiff and the McDonald's Class

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and against McDonald's;

- D. Enjoining McDonald's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the McDonald's Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the McDonald's Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
- G. Granting all such further and other relief as the Court deems just and appropriate.

COUNT II
**(Unjust Enrichment
Against McDonald's)**

49. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with the same force and effect as though fully set forth herein.

50. Plaintiff brings this claim individually, and on behalf of all similarly situated residents in and under the unjust enrichment laws of Illinois.

51. As a direct and proximate result of McDonald's misconduct as set forth above, McDonald's has been unjustly enriched.

52. Specifically, by its misconduct described herein, McDonald's has accepted a benefit (*i.e.*, monies paid by Plaintiff and the proposed Class members for the purchase of the MCDONALD'S® Extra Value Meal) to the detriment of Plaintiff and the proposed Class.

53. McDonald's retention of the full amount of monies paid for the MCDONALD'S® Extra Value Meal violates the fundamental principles of justice, equity, and good conscience.

54. McDonald's accepted the benefit based on its misrepresentations and omissions regarding the MCDONALD'S® Extra Value Meal to the Plaintiff and the proposed

Class members, and it would be inequitable for McDonald's to retain the benefit of those monies, as it was paid the money under false pretenses.

55. McDonald's has obtained money to which it is not entitled, and interest on that money, and under these circumstances equity and good conscience require that McDonald's return the money with interest to the Plaintiff and the proposed Class.

56. As a direct and proximate result of the foregoing, Plaintiff and the proposed Class have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, pray for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth 735 ILCS 5/2-801, and certifying the McDonald's Class defined herein;
- B. Designating Plaintiff as representative of the McDonald's Class, and her undersigned counsel as Class Counsel;
- C. Entering judgment in favor of Plaintiff and the McDonald's Class and against McDonalds;
- D. Enjoining McDonald's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the McDonald's Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the McDonald's Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
- G. Granting all such further and other relief as the Court deems just and appropriate.

COUNT III

(Violation of the Illinois Consumer Fraud and Deceptive Trade Practices Act

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Against Salabad)

57. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with the same force and effect as though fully set forth herein.

58. Plaintiff brings Count III individually, and on behalf of all similarly situated, against Salabad pursuant to the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 501/1 *et seq.*

59. Salabad's foregoing misrepresentations and omissions regarding the value of certain Extra Value Meal are deceptive and/or unfair acts or practices prohibited by the consumer fraud statute set forth above.

60. Salabad's intended to be deceptive and/or unfair to Plaintiff and the proposed Class by intentionally making the foregoing false and misleading statements and omitting accurate statements as alleged above, because had Defendants provided accurate information, Plaintiff and the proposed Class members would not have purchased the Extra Value Meal.

61. Salabad's practice of creating, approving and distributing advertising for Extra Value Meals that contained false and misleading information for the purpose of selling them to Plaintiff and the proposed Class, as alleged in detail *supra*, is both an unfair act and deceptive practice prohibited by the foregoing statute.

62. Salabad intended to be deceptive and unfair to Plaintiff and the proposed Class by unlawfully representing that each of Extra Value Meal is a value compared to purchasing the items a la carte. Salabad's intent is evidenced by the common understating and expectation of a meal advertised as a value.

63. Salabad intended that Plaintiff and the proposed Class members rely on Salabad's misrepresentations as to the value of the Extra Value Meals when purchasing

them, and Salabad omitted to disclose to or notify Plaintiff and the proposed Class that certain Extra Value Meals were more costly than purchasing the items a la carte.

64. Plaintiff and the proposed Class members justifiably relied on the misrepresentations and omissions to their detriment by purchasing the Extra Value Meals after seeing Salabad's advertising. Indeed, Salabad made no attempt to inform consumers that certain Extra Value Meals are more expensive.

65. Had Plaintiff and the proposed Class members known the truth, they would not have purchased certain Extra Value Meal; rather, they would have purchased each item separately.

66. The above-described deceptive and unfair acts and practices were used or employed in the conduct of trade or commerce, namely, the sale of the Extra Value Meals to Plaintiff and the proposed Class members.

67. The above-described deceptive and unfair acts offend public policy and cause substantial injury to consumers.

68. As a direct and proximate result of the foregoing, the Plaintiff and Class members have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, prays for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth in 735 ILCS 5/2-801, and certifying the Salabad Class defined herein;
- B. Designating Plaintiff as representative of the Salabad Class, and her undersigned counsel as Class Counsel;

- C. Entering judgment in favor of Plaintiff and the Salabad Class and against Salabad;
- D. Enjoining Salabad's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the Salabad Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the Salabad Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
- G. Granting all such further and other relief as the Court deems just and appropriate.

COUNT IV
(Unjust Enrichment
Against Salabad)

69. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with the same force and effect as though fully set forth herein.

70. Plaintiff brings this claim individually, and on behalf of all similarly situated residents in and under the unjust enrichment laws of Illinois.

71. As a direct and proximate result of Salabad's misconduct as set forth above, Salabad has been unjustly enriched.

72. Specifically, by its misconduct described herein, Salabad's has accepted a benefit (*i.e.*, monies paid by Plaintiff and the proposed Class members for the purchase of certain Extra Value Meal) to the detriment of Plaintiff and the proposed Class.

73. Salabad's retention of the full amount of monies paid for the Extra Value Meals violates the fundamental principles of justice, equity, and good conscience.

74. Salabad accepted the benefit based on its misrepresentations and omissions regarding the MCDONALD'S® Extra Value Meal to the Plaintiff and the proposed Class

members, and it would be inequitable for Salabad to retain the benefit of those monies, as it was paid the money under false pretenses.

75. Salabad has obtained money to which it is not entitled, and interest on that money, and under these circumstances equity and good conscience require that McDonald's return the money with interest to the Plaintiff and the proposed Class.

76. As a direct and proximate result of the foregoing, Plaintiff and the proposed Class have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, pray for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth 735 ILCS 5/2-801, and certifying the Salabad Class defined herein;
- B. Designating Plaintiff as representative of the Salabad Class, and her undersigned counsel as Class Counsel;
- C. Entering judgment in favor of Plaintiff and the Salabad Class and against Salabad;
- D. Enjoining Salabad's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the Salabad s Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the Salabad Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
- G. Granting all such further and other relief as the Court deems just and appropriate.

JURY DEMAND

Plaintiff demands a trial by a 12-person jury.

Dated: December 22, 2016

Respectfully submitted,

KELLY KILLEEN, individually and on behalf of
all others similarly situated,

By: /s/ Samuel A. Shelist
One of her attorneys

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NOTICE OF LIEN AND ASSIGNMENT

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

/s/ Samuel A. Shelist

Samuel A. Shelist

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EXHIBIT B

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CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
CHANCERY DIVISION
CLERK DOROTHY BROWN

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

KELLY KILLEEN,)	
Individually and on behalf all others similarly situated,)	
)	
Plaintiff,)	
)	No.
v.)	
)	Class Action
MCDONALD'S CORPORATION and)	
SALABAD, LLC,)	
)	
Defendants.)	

CLASS ACTION COMPLAINT

NOW COMES Plaintiff Kelly Killeen ("Plaintiff"), individually, and on behalf of all others similarly situated, by and through counsel, and for her complaint against McDonald's Corporation(McDonald's)and Salabad, LLC ("Salabad, LLC) (McDonald's and Salabad are collectively "Defendants"), states as follows:

Nature of the Case

1. Plaintiff brings this action individually and on behalf of a proposed class (the "McDonald's Class"), as more fully defined below, of similarly situated consumers throughout Illinois against McDonalds to redress the pervasive pattern of fraudulent, deceptive and otherwise improper advertising, sales and marketing practices that McDonald's continues to engage in regarding certain of its Extra Value Meals®, including its Two Cheeseburger Extra Value Meal and Sausage Burrito(2) Extra Value Meal. In reality, certain of McDonalds' Extra Value Meals are not a value because they are more expensive than purchasing off the a la carte menu each of the items that comprise the Meals.

2. Plaintiff also brings this action individually and on behalf of a proposed class (the "Salabad Class"), as more fully defined below, of similarly situated consumers of the McDonald's store #6491 located at 36 W. Randolph, Chicago, Illinois, to redress the pervasive pattern of fraudulent, deceptive and otherwise improper advertising, sales and marketing practices that Salabad continues to engage in regarding certain of its Extra Value Meals, including its Sausage Burrito(2) Extra Value Meal. In reality, certain of Defendants' are not a value because they are more expensive than purchasing each of the items that comprise the Meals.

3. As more fully alleged herein, Defendants' schemes and artifices to defraud Plaintiff and other members of the proposed Class consist of systemic and continuing practices of disseminating false and misleading information via television commercials, Internet websites and postings, point of purchase advertisements and national print advertisements, all of which are intended to trick unsuspecting consumers, including Plaintiff and other members of the proposed Class, into believing that they are receiving a value by purchasing one of the Meals rather than purchasing each item in the Extra Value Meal separately.

4. MCDONALD'S® and EXTRA VALUE MEAL® are registered trademarks of McDonald's. The MCDONALD'S® brand franchise is the world's largest foodservice retailer, with more than 14,000 locations in the United States and serving more than one billion pounds of beef per year in the United States.

5. Defendants heavily market the Extra Value Meal® as being a value. This is reinforced in Defendant's marketing campaigns, which includes its current advertising for its Extra Value Meal on its website, which states:

EXTRA VALUE MEAL

You value food just as much as you value a good price. Thanks to our delicious meal bundles, you can have both. A meal with quality ingredients that's easy on the wallet? That's a great deal.

6. However, some of the Extra Value Meals at certain MCDONALD'S® stores are actually more expensive than purchasing the items separately.

7. Defendants' comprehensive advertising campaign for Extra Value Meal has been extensive, and Defendants have spent a significant amount of money to convey deceptive messages to consumers throughout the United States. Defendants utilize a wide array of media to convey their deceptive claims about the Extra Value Meal, including television, magazines, and the Internet. Through this massive marketing campaign, Defendants have conveyed one message about these Extra Value Meals, inherent in the name: "Extra Value Meals" are actually a value compared to purchasing the items separately. Each person who has purchased an Extra Value Meal, including the Plaintiff, has been exposed to Defendant's misleading advertising message and purchased those Extra Value Meals as a result of that advertising.

8. Plaintiff brings this action on behalf of herself and other similarly situated consumers to halt the dissemination of these false and misleading advertising messages, correct the false and misleading perception that they have created in the minds of consumers, and obtain redress for those who have purchased Extra Value Meals from Defendants.

9. Plaintiff alleges violations of the consumer fraud statutes of the state of

Illinois, as well as unjust enrichment under the laws of the state of Illinois.

The Parties

10. Plaintiff Killeen is, and at all time relevant to this action has been, a resident and citizen of Illinois.

11. Plaintiff was repeatedly exposed to and saw Defendants' advertisements and representations regarding the McDondald's Extra Value Meals in Illinois. After seeing Defendant's advertising regarding the Extra Value Meal, Plaintiff purchased a Sausage Burrito (2) Extra Value at the MCDONALD'S® restaurant, Store #6491, owned by Salabd, LLC, located at 36 W. Randolph, Chicago, Illinois.

12. Plaintiff purchased the Sausage Burrito (2) Extra Value in reliance on the misrepresentations and omissions of the Defendants. Plaintiff suffered an injury in fact and lost money as a result of the deceptive and unfair conduct described herein, because the Extra Value Meal that she purchased was more expensive than if she had purchased the items that comprised the meal separately, in other words the Meal was not a value.

13. Defendant McDonald's is a corporation incorporated in the State of Illinois, and has its principal place of business in Oak Brook, Illinois.

14. Defendant Salabad, LLC is a private corporation incorporated in the State of Illinois and its principal office is in Northfield, Illinois. Salabad, LLC is the franchisee of Store #6491, located at 36 W. Randolph, Chicago, Illinois.

15. McDonald's, as the franchisor of MCDONALD'S® restaurants, is in the business of promoting, marketing, distributing and selling MCDONALD'S Extra Value Meals® throughout the United States, including to millions of consumers nationwide, through MCDONALD'S® brand restaurants. Although MCDONALD'S® restaurants are

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owned and/or operated by franchisees, McDonald's creates, maintains and enforces strict uniform standards and practices for all aspects of its MCDONALD'S® restaurants.

16. Upon information and belief, McDonald's has the right of complete or substantial control over all MCDONALD'S® restaurants in that it could implement and direct the policies and procedures of those restaurants as well as dictate the restaurants' appearance, equipment, menu, hours of operation, employees' appearance and demeanor, and marketing and advertising. McDonald's complete or substantial control caused many MCDONALD'S® stores throughout Illinois to charge as much or more for certain Extra Value Meals than if the items were ordered a la carte, including Store# 6818 (23 N. Western Ave, Chicago), Store# 18236 (40 West Main St., Albion), Store # 11009 (1212 W. Main St., Fairfield), Store# 2887 (1304 N. Keller Dr., Effingham) and Store #25192 (2911 S. Banker, Effingham). McDonald's deceptive and unfair practices occurred throughout the United States, including Store#31491 (Atlanta, Georgia).

17. Further, Defendant and its franchisees hold themselves out to the general public as one company—MCDONALD'S®—as evidenced by the fact that the advertising materials, signs, and store appearance all are uniform and identify McDonald's franchisees' restaurants as MCDONALD'S®.

Jurisdiction and Venue

18. Jurisdiction and venue are proper in this Court because this action arose out of:

(i) business transacted by Defendants in Cook County, Illinois.

Facts Common to All Counts

19. Defendants engage in an extensive, nationwide advertising and marketing campaign of its Extra Value Meals, consisting of print, television, Internet-based media and in-store advertisements.

20. Defendant's advertisements relating to Extra Value Meals are intended to convey to consumers that the meal is less expensive than purchasing the items individually.

21. Indeed, a customer who purchases an Extra Value Meal receives the same items that someone who orders each item individually would receive, but pays more for those items.

22. Defendant's statements regarding Extra Value Meals, in conjunction with the impression regarding the value received by ordering a meal rather than each item individually intended to convey by naming and promoting them as Extra Value Meals, were false, deceptive and misleading. Plaintiff and the proposed Class members purchased Extra Value Meals in reliance on the foregoing uniform misrepresentations and omissions of the Defendants.

23. Plaintiff purchased the Sausage Burrito (2) Extra Value Meal at Store #6491, owned by Salabd, LLC, located at 36 W. Randolph, Chicago, Illinois. The cost of the Sausage Burrito Extra Value Meal was \$5.08; whereas, if she had purchased the 2 burritos, hash brown and medium coffee from the a la carte menu, the cost would have been \$4.97.

Class Action Allegations

24. Plaintiff brings this lawsuit, both individually and as a class action on behalf of similarly situated purchasers of the MCDONALD'S® Extra Value Meal®, pursuant to 735 ILCS 5/2-801. The proposed Classes are defined as:

McDonald's Class: All persons who paid an inflated price for food items by purchasing an Extra Value Meal in Illinois.

Salabad Class: All persons who paid an inflated price for food items by purchasing an Extra Value Meal at Store #6491 at 36 W. Randolph, Chicago, Illinois.

Excluded from the proposed Classes are Defendants, its respective officers, directors and employees, any entity that has a controlling interest in Defendants, and all of their respective employees, affiliates, legal representatives, heirs, successors, or assignees. Any claims for personal injury or consequential damages, not otherwise permitted under the facts pled herein, are expressly excluded from this action. Plaintiff reserves the right to amend the Class definitions as necessary.

25. On information and belief, class members are so numerous that individual joinder of all members is impractical, and while the exact number of the class members is unknown at the present time, it is ascertainable by appropriate discovery.

26. Common questions of law and fact exist as to all class members and predominate over any questions that affect only individual class members.

27. The questions of law and fact that are common to both classes and that predominate include, but are not limited to:

- a. whether Defendants represented that a certain Extra Value Meals were a value;
- b. whether Defendants failed to disclose that certain Extra Value Meals were more expensive than purchasing the included items a la carte;
- c. whether Defendants' claims regarding certain Extra Value Meals are deceptive or misleading;
- d. whether Defendants engaged in false, deceptive and/or misleading advertising;
- e. whether Defendants' conduct as alleged herein violates the consumer fraud statute of Illinois

- f. whether Defendants' conduct as alleged herein violates public policy;
- g. whether Plaintiff and Class members have sustained monetary loss and the proper measure of that loss;
- h. whether Plaintiff and Class members are entitled to declaratory and injunctive relief; and
- i. whether Defendants were unjustly enriched.

28. Plaintiff will fairly and adequately protect the interests of the class in that Plaintiff's claims are typical of those classes and Plaintiff does not have any interests which are adverse to the other class members.

29. Plaintiff has retained competent counsel experienced in handling class actions. Neither Plaintiff nor their counsel have any interests which might cause them not to vigorously prosecute this action.

30. Plaintiff's claims are based on similar facts and the same legal theories as those of the class members.

31. Class action treatment is superior to the alternatives, if any, for the fair and efficient adjudication of the controversy described herein because it permits a large number of injured persons to prosecute their common claims in a single forum simultaneously, efficiently, and without duplication of evidence and effort. Class treatment is especially appropriate for the current controversy because it is the only practical means for class members to receive redress given that the individual claims are small in amount.

32. Upon information and belief, the Class comprise hundreds of consumers, and is so numerous that joinder of all members of the Class is impracticable. While the exact number of Class members is presently unknown and can only be ascertained through

discovery, Plaintiff believes that there are hundreds of Class members based upon the fact that MCDONALD'S® is one of the largest restaurant chains in Illinois and Store #6491 serves thousands of people every day.

33. Plaintiff's claims are typical of the claims of the proposed Class, and Plaintiff will fairly and adequately represent and protect the interests of the proposed Classes. Plaintiff does not have any interests antagonistic to those of the proposed Class. Plaintiff has retained competent counsel experienced in the prosecution of this type of litigation. The questions of law and fact common to the proposed Class members, some of which are set out above, predominate over any questions affecting only individual Class members.

34. A class action is superior to other available methods for the fair and efficient adjudication of this controversy. The expense and burden of individual litigation would make it impracticable or impossible for proposed Class members to prosecute their claims individually. The trial and the litigation of Plaintiff's claims are manageable.

35. Unless a class is certified, Defendant will retain monies received as a result of its conduct that was wrongfully taken from Plaintiff and proposed Class members. Unless an injunction is issued, Defendant will continue to commit the violations alleged, and the members of the proposed Class and the general public will continue to be misled.

36. Defendant has acted and refuses to act on grounds generally applicable to the proposed Class, making appropriate final injunctive relief with respect to the proposed Class as a whole.

COUNT I
**(Violation of the Illinois Consumer Fraud and Deceptive Trade Practices Act
Against McDonald's)**

37. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with

the same force and effect as though fully set forth herein.

38. Plaintiff brings Count I individually, and on behalf of all similarly situated, against McDonald's pursuant to the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 501/1 *et seq.*;

39. McDonald's foregoing misrepresentations and omissions regarding the value of certain Extra Value Meal are deceptive and/or unfair acts or practices prohibited by the consumer fraud statute set forth above.

40. McDonald's intended to be deceptive and/or unfair to Plaintiff and the proposed Class by intentionally making the foregoing false and misleading statements and omitting accurate statements as alleged above, because had Defendants provided accurate information, Plaintiff and the proposed Class members would not have purchased the Extra Value Meal.

41. McDonald's practice of creating, approving and distributing advertising for Extra Value Meals that contained false and misleading information for the purpose of selling them to Plaintiff and the proposed Class, as alleged in detail *supra*, is both an unfair act and deceptive practice prohibited by the foregoing statute.

42. McDonald's intended to be deceptive and unfair to Plaintiff and the proposed Class by unlawfully representing that each of MCDONALD'S® Extra Value Meal is a value compared to purchasing the items a la carte. McDonald's intent is evidenced by the common understating and expectation of a meal advertised as a value.

43. McDonald's intended that Plaintiff and the proposed Class members rely on McDonald's misrepresentations as to the value of the Extra Value Meals when purchasing them, and McDonald's omitted to disclose to or notify Plaintiff and the proposed

Class that certain Extra Value Meals were more costly than purchasing the items a la carte.

44. Plaintiff and the proposed Class members justifiably relied on the misrepresentations and omissions to their detriment by purchasing the Extra Value Meals after seeing MCDONALD'S® advertising. Indeed, McDonald's made no attempt to inform consumers that certain Extra Value Meals are more expensive.

45. Had Plaintiff and the proposed Class members known the truth, they would not have purchased certain Extra Value Meal; rather, they would have purchased each item separately.

46. The above-described deceptive and unfair acts and practices were used or employed in the conduct of trade or commerce, namely, the sale of the Extra Value Meals to Plaintiff and the proposed Class members.

47. The above-described deceptive and unfair acts offend public policy and cause substantial injury to consumers.

48. As a direct and proximate result of the foregoing, the Plaintiff and Class members have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, prays for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth in 735 ILCS 5/2-801, and certifying the McDonald's Class defined herein;
- B. Designating Plaintiff as representative of the McDonald's Class, and her undersigned counsel as Class Counsel;
- C. Entering judgment in favor of Plaintiff and the McDonald's Class

and against McDonald's;

- D. Enjoining McDonald's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the McDonald's Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the McDonald's Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
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COUNT II
**(Unjust Enrichment
Against McDonald's)**

49. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with the same force and effect as though fully set forth herein.

50. Plaintiff brings this claim individually, and on behalf of all similarly situated residents in and under the unjust enrichment laws of Illinois.

51. As a direct and proximate result of McDonald's misconduct as set forth above, McDonald's has been unjustly enriched.

52. Specifically, by its misconduct described herein, McDonald's has accepted a benefit (*i.e.*, monies paid by Plaintiff and the proposed Class members for the purchase of the MCDONALD'S® Extra Value Meal) to the detriment of Plaintiff and the proposed Class.

53. McDonald's retention of the full amount of monies paid for the MCDONALD'S® Extra Value Meal violates the fundamental principles of justice, equity, and good conscience.

54. McDonald's accepted the benefit based on its misrepresentations and omissions regarding the MCDONALD'S® Extra Value Meal to the Plaintiff and the proposed

Class members, and it would be inequitable for McDonald's to retain the benefit of those monies, as it was paid the money under false pretenses.

55. McDonald's has obtained money to which it is not entitled, and interest on that money, and under these circumstances equity and good conscience require that McDonald's return the money with interest to the Plaintiff and the proposed Class.

56. As a direct and proximate result of the foregoing, Plaintiff and the proposed Class have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, pray for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth 735 ILCS 5/2-801, and certifying the McDonald's Class defined herein;
- B. Designating Plaintiff as representative of the McDonald's Class, and her undersigned counsel as Class Counsel;
- C. Entering judgment in favor of Plaintiff and the McDonald's Class and against McDonalds;
- D. Enjoining McDonald's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the McDonald's Class restitution and any other equitable relief that may be appropriate;
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(Violation of the Illinois Consumer Fraud and Deceptive Trade Practices Act

Against Salabad)

57. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with the same force and effect as though fully set forth herein.

58. Plaintiff brings Count III individually, and on behalf of all similarly situated, against Salabad pursuant to the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 501/1 *et seq.*

59. Salabad's foregoing misrepresentations and omissions regarding the value of certain Extra Value Meal are deceptive and/or unfair acts or practices prohibited by the consumer fraud statute set forth above.

60. Salabad's intended to be deceptive and/or unfair to Plaintiff and the proposed Class by intentionally making the foregoing false and misleading statements and omitting accurate statements as alleged above, because had Defendants provided accurate information, Plaintiff and the proposed Class members would not have purchased the Extra Value Meal.

61. Salabad's practice of creating, approving and distributing advertising for Extra Value Meals that contained false and misleading information for the purpose of selling them to Plaintiff and the proposed Class, as alleged in detail *supra*, is both an unfair act and deceptive practice prohibited by the foregoing statute.

62. Salabad intended to be deceptive and unfair to Plaintiff and the proposed Class by unlawfully representing that each of Extra Value Meal is a value compared to purchasing the items a la carte. Salabad's intent is evidenced by the common understating and expectation of a meal advertised as a value.

63. Salabad intended that Plaintiff and the proposed Class members rely on Salabad's misrepresentations as to the value of the Extra Value Meals when purchasing

them, and Salabad omitted to disclose to or notify Plaintiff and the proposed Class that certain Extra Value Meals were more costly than purchasing the items a la carte.

64. Plaintiff and the proposed Class members justifiably relied on the misrepresentations and omissions to their detriment by purchasing the Extra Value Meals after seeing Salabad's advertising. Indeed, Salabad made no attempt to inform consumers that certain Extra Value Meals are more expensive.

65. Had Plaintiff and the proposed Class members known the truth, they would not have purchased certain Extra Value Meal; rather, they would have purchased each item separately.

66. The above-described deceptive and unfair acts and practices were used or employed in the conduct of trade or commerce, namely, the sale of the Extra Value Meals to Plaintiff and the proposed Class members.

67. The above-described deceptive and unfair acts offend public policy and cause substantial injury to consumers.

68. As a direct and proximate result of the foregoing, the Plaintiff and Class members have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, prays for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth in 735 ILCS 5/2-801, and certifying the Salabad Class defined herein;
- B. Designating Plaintiff as representative of the Salabad Class, and her undersigned counsel as Class Counsel;

- C. Entering judgment in favor of Plaintiff and the Salabad Class and against Salabad;
- D. Enjoining Salabad's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the Salabad Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the Salabad Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
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COUNT IV
**(Unjust Enrichment
Against Salabad)**

69. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 36 with the same force and effect as though fully set forth herein.

70. Plaintiff brings this claim individually, and on behalf of all similarly situated residents in and under the unjust enrichment laws of Illinois.

71. As a direct and proximate result of Salabad's misconduct as set forth above, Salabad has been unjustly enriched.

72. Specifically, by its misconduct described herein, Salabad's has accepted a benefit (*i.e.*, monies paid by Plaintiff and the proposed Class members for the purchase of certain Extra Value Meal) to the detriment of Plaintiff and the proposed Class.

73. Salabad's retention of the full amount of monies paid for the Extra Value Meals violates the fundamental principles of justice, equity, and good conscience.

74. Salabad accepted the benefit based on its misrepresentations and omissions regarding the MCDONALD'S® Extra Value Meal to the Plaintiff and the proposed Class

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2016-CH-16519
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members, and it would be inequitable for Salabad to retain the benefit of those monies, as it was paid the money under false pretenses.

75. Salabad has obtained money to which it is not entitled, and interest on that money, and under these circumstances equity and good conscience require that McDonald's return the money with interest to the Plaintiff and the proposed Class.

76. As a direct and proximate result of the foregoing, Plaintiff and the proposed Class have been damaged in an amount to be determined at trial.

**PRAYER FOR
RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the Class, pray for an Order as follows:

- A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth 735 ILCS 5/2-801, and certifying the Salabad Class defined herein;
- B. Designating Plaintiff as representative of the Salabad Class, and her undersigned counsel as Class Counsel;
- C. Entering judgment in favor of Plaintiff and the Salabad Class and against Salabad;
- D. Enjoining Salabad's illegal conduct alleged herein and ordering disgorgement of any of its ill-gotten gains;
- E. Awarding Plaintiff and the Salabad s Class restitution and any other equitable relief that may be appropriate;
- F. Awarding Plaintiff and the Salabad Class their actual damages, treble damages, punitive damages, attorney's fees and costs, including interest thereon, as allowed or required by law; and
- G. Granting all such further and other relief as the Court deems just and appropriate.

JURY DEMAND

Plaintiff demands a trial by a 12-person jury.

Dated: December 22, 2016

Respectfully submitted,

KELLY KILLEEN, individually and on behalf of
all others similarly situated,

By: /s/ Samuel A. Shelist
One of her attorneys

ELECTRONICALLY FILED
12/22/2016 11:38 AM
2016-CH-16519
PAGE 18 of 19

Attorney No. 43236
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NOTICE OF LIEN AND ASSIGNMENT

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

/s/ Samuel A. Shelist

Samuel A. Shelist

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2016-CH-16519
PAGE 19 of 19

EXHIBIT C

Law Bulletin

Information Network



Case Number: 2016CH-16519
Case Name: KILLEEN KELLY v MCDONALD'S CORPORATION
Jurisdiction: Chancery Division [Chicago, IL 60602]
Complaint: CLASS ACTION COMPLAINT FILED (JURY DEMAND)
Filed: 12/22/16

Activity Date: 12/22/16
Activity: MOTION FILED
Participant:

.198294.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

FILED
FEB 2 2016 DEC 22 PH 2:36
FEB 23 P 2:16

KELLY KILLEEN,
Individually and on behalf all others similarly situated,

Plaintiff,

v.

MCDONALD'S CORPORATION and
SALABAD, LLC,

Defendants.

Class Action

No. 2016-CH-16519

Calendar 06

Judge Celia G. Gamrath

MOTION FOR CLASS CERTIFICATION

Plaintiff, Kelly Killeen ("Killeen" or "Plaintiff"), individually and on behalf of all others similarly situated, by and through her attorneys, respectfully submits this motion for class certification.

In support of this motion, Plaintiff states the following:

1. Plaintiff's Class Action Complaint seeks to represent two classes of similarly situated consumers to redress the pervasive pattern of fraudulent, deceptive and otherwise improper advertising, sales and marketing practices that Defendants continue to engage in regarding certain of their Extra Value Meals®, In reality, certain of McDonalds' Extra Value Meals are not a value because they are more expensive than purchasing separately each of the items that comprise the Meals.

2. Plaintiff seeks to represent the following classes:

McDonald's Class: All persons who paid an inflated price for food items by purchasing an Extra Value Meal from a MCDONALD'S® store in Illinois.

Salabad Class: All persons who paid an inflated price for food items by purchasing a MCDONALD'S® Extra Value Meal at the MCDONALD'S® Store #6491 at 36 W. Randolph, Chicago, Illinois.

3. Relevant facts in support of class certification are included in Plaintiff's Class Action Complaint, and are incorporated herein as if separately stated herein.

4. Defendants' schemes and artifices to defraud Plaintiff and other members of the proposed Class consist of systemic and continuing practices of disseminating false and misleading information via television commercials, Internet websites and postings, point of purchase advertisements and national print advertisements, all of which are intended to trick unsuspecting consumers, including Plaintiff and other members of the proposed Class, into believing that they are receiving a value by purchasing one of the Meals rather than purchasing each item in the Extra Value Meal separately.

5. Through this massive marketing campaign, Defendants have conveyed one message about these Extra Value Meals, inherent in the name: "Extra Value Meals" are actually a value compared to purchasing the items separately. Each person who has purchased an Extra Value Meal, including the Plaintiff, has been exposed to Defendant's misleading advertising message and purchased those Extra Value Meals as a result of that advertising.

6. Common questions of law and fact exist as to all class members and predominate over any questions that affect only individual class members.

7. The questions of law and fact that are common to both classes and that predominate include, but are not limited to:

- a. whether Defendants represented that a certain Extra Value Meals were a value;
- b. whether Defendants failed to disclose that certain Extra Value Meals were more expensive than purchasing the included items a la carte;
- c. whether Defendants' claims regarding certain Extra Value Meals are deceptive or misleading;
- d. whether Defendants engaged in false, deceptive and/or misleading

advertising;

- e. whether Defendants' conduct as alleged herein violates the consumer fraud statute of Illinois
- f. whether Defendants' conduct as alleged herein violates public policy;
- g. whether Plaintiff and Class members have sustained monetary loss and the proper measure of that loss;
- h. whether Plaintiff and Class members are entitled to declaratory and injunctive relief; and
- i. whether Defendants were unjustly enriched.

8. Plaintiff will fairly and adequately protect the interests of the class in that Plaintiff's claims are typical of those classes and Plaintiff does not have any interests which are adverse to the other class members.

9. Plaintiff has retained competent counsel experienced in handling class actions. Neither Plaintiff nor her counsel have any interests which might cause her not to vigorously prosecute this action.

10. As illustrated above, Plaintiff's claims are based on similar facts and the same legal theories as those of the class members.

11. Class action treatment is superior to the alternatives, if any, for the fair and efficient adjudication of the controversy described herein because it permits a large number of injured persons to prosecute their common claims in a single forum simultaneously, efficiently, and without duplication of evidence and effort. Class treatment is especially appropriate for the current controversy because it is the only practical means for class members to receive redress given that the individual claims are small in amount.

12. Upon information and belief, both classes comprise hundreds of consumers, and are so numerous that joinder of all members of the Class is impracticable. While the exact

number of Class members is presently unknown and can only be ascertained through discovery, Plaintiff believes that there are hundreds of Class members based upon the fact that MCDONALD'S® is one of the largest restaurant chains in Illinois and Store #6491 serves thousands of people every day.

13. Plaintiff will file a Memorandum of Law in support of this motion as soon as practicable as permitted by this Honorable Court.

WHEREFORE, for the foregoing reasons, and for the reasons to be stated in her forthcoming Memorandum of Law, Plaintiff respectfully requests that this Court grant this motion and certify the classes defined above, appoint the named plaintiff as class representative of the class, and appoint her attorneys as class counsel.

Dated: December 22, 2016

Respectfully submitted,

KELLY KILLEEN, individually and on behalf of all others
similarly situated,

By: /s/ Samuel A. Shelist
One of her attorneys

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Law Bulletin

Information Network



Case Number: 2016CH-16519
Case Name: KILLEEN KELLY v MCDONALD'S CORPORATION
Jurisdiction: Chancery Division [Chicago, IL 60602]
Complaint: CLASS ACTION COMPLAINT FILED (JURY DEMAND)
Filed: 12/22/16

Activity Date: 12/23/16
Activity: NOTICE OF MOTION FILED
Participant:

.198295.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

FILED-2

2016 DEC 23 P 2:15

KELLY KILLEEN,
Individually and on behalf all others similarly situated,

Plaintiff,

v.

MCDONALD'S CORPORATION and
SALABAD, LLC,

Defendants.

Class Action

No. 2016-CH-16519

Calendar 06

Judge Celia G. Gamrath

NOTICE OF MOTION

TO: McDonald's Corporation	Salabad, LLC
R/A Prentice Hall Corporation	R/A Douglas Robson
801 Adlai Stevenson Drive	1 N. Wacker Dr., Ste. 4400
Springfield, IL 62703	Chicago, IL 60606

On the 9th day of February, 2017 at 9:15 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Celia Gamrath in the Courtroom usually occupied by her in Room 2508 at the Richard J. Daley Center, Chicago, Illinois and then present the attached *Plaintiff's Motion for Class Certification*.

Attorney No. 43236
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Samuel A. Shelist
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Chicago, Illinois 60602
Telephone (312) 644-3900


Attorney for Plaintiff

JS Law
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Chicago, Illinois 60602
(312) 756-1330
Attorney No: 48317
jeffs@jsslawoffices.com

CERTIFICATE OF SERVICE

I, JEFFREY SOBEK, an Attorney on oath, state that I served this Notice upon the above-addressed party(ies) in the following manner:

By delivering to the address stated above, via [the U.S. Postal Service, with proper postage prepaid] [e-mail] [personal delivery] a copy of said pleadings, on this ____ day of _____, _____.

JEFFREY SOBEK

Law Bulletin

Information Network



Case Number: 2016CH-16519
Case Name: KILLEEN KELLY v MCDONALD'S CORPORATION
Jurisdiction: Chancery Division [Chicago, IL 60602]
Complaint: CLASS ACTION COMPLAINT FILED (JURY DEMAND)
Filed: 12/22/16

Activity Date: 12/23/16
Activity: MOTION SCHEDULED (MOTION COUNTER ONLY)
Participant:

.198296.

Motion Slip

(08/10/16) CCCH0048 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

MOTION SLIP

FILED-2

CASE NO. 2016 CH 16519

2016 DEC 23 P 2:15

CALENDAR: 06ATTORNEY CODE: 43236MOTION FOR: ☒ PLAINTIFF ☐ DEFENDANTDATE REQUESTING: 2/9/17CALL TIME: 9:15 a.m./p.m.☒ CONTESTED ☐ NOT CONTESTEDPLAINTIFF'S NAME: KilleenDEFENDANT'S NAME: McDonald'sATTORNEY'S NAME: Jeffrey SobelFIRM NAME: JS LawATTY. TELEPHONE: 312 756 1380PLEASE CHECK BOX ON THE REVERSE SIDE OF THIS FORM FOR THE
TYPE OF MOTION.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

(08/10/16) CCCH 0048 B

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION
SPINDLED MOTION FORM

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| <input type="checkbox"/> 1502 ALTERNATIVE SERVICE | <input type="checkbox"/> 1535 SUBST. OF JUSTICE |
| <input type="checkbox"/> 1503 AMEND ORDER | <input type="checkbox"/> 1536 PLACE MORT. IN POSSESSION |
| <input type="checkbox"/> 1504 APPT. COMMISSIONER | <input type="checkbox"/> 1537 PRELIMINARY INJUNCTION |
| <input type="checkbox"/> 1505 APPT. RECEIVER | <input type="checkbox"/> 1538 PROTECTIVE ORDER |
| <input type="checkbox"/> 1506 APPT. SELLING OFFICER | <input type="checkbox"/> 1539 PROVE-UP |
| <input type="checkbox"/> 1507 APPROVE RECEIVER RPT. | <input type="checkbox"/> 1540 QUASH |
| <input type="checkbox"/> 1508 APPROVE SALE | <input type="checkbox"/> 1541 RECONSIDER |
| <input checked="" type="checkbox"/> 1509 CERTIFY CLASS | <input type="checkbox"/> 1542 RELEASE SURPLUS |
| <input type="checkbox"/> 1511 CHANGE OF VENUE | <input type="checkbox"/> 1543 RESET BRIEFING - SCHEDULE |
| <input type="checkbox"/> 1512 CITATION - DISCOVER ASSETS | <input type="checkbox"/> 1544 RULE TO SHOW CAUSE |
| <input type="checkbox"/> 1513 COMPEL DISCOVERY | <input type="checkbox"/> 1545 SANCTIONS |
| <input type="checkbox"/> 1514 CONSOLIDATE | <input type="checkbox"/> 1546 SET APPEAL BOND |
| <input type="checkbox"/> 1515 CONTINUE HEARING | <input type="checkbox"/> 1547 SET BOND |
| <input type="checkbox"/> 1516 DEFAULT | <input type="checkbox"/> 1548 SET BRIEFING SCHEDULE |
| <input type="checkbox"/> 1517 DEPOSIT FUNDS | <input type="checkbox"/> 1549 SET CASE MANAGEMENT CONFERENCE |
| <input type="checkbox"/> 1518 DISPERSE FUNDS | <input type="checkbox"/> 1550 PRETRIAL SETTLEMENT CONFERENCE |
| <input type="checkbox"/> 1519 DISCHARGE RECEIVER | <input type="checkbox"/> 1551 SPECIAL PROCESS SERVER |
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| <input type="checkbox"/> 1522 DISMISS PARTY | <input type="checkbox"/> 1554 STAY SALE |
| <input type="checkbox"/> 1523 EXTEND DISCOVERY DATE | <input type="checkbox"/> 1555 STRIKE PLEADING |
| <input type="checkbox"/> 1524 EXTENDED POSSESSION | <input type="checkbox"/> 1556 SUBSTITUTE ATTORNEY |
| <input type="checkbox"/> 1525 EXTEND TIME FOR FILING | <input type="checkbox"/> 1557 SUMMARY JUDGMENT |
| <input type="checkbox"/> 1526 FILE AMENDED PLEADINGS | <input type="checkbox"/> 1558 SUPPLEMENTAL DISCOVERY |
| <input type="checkbox"/> 1527 GOOD FAITH FINDING | <input type="checkbox"/> 1559 TEMPORARY RESTRAINING ORDER |
| <input type="checkbox"/> 1528 INTERLOCUTORY APPEAL | <input type="checkbox"/> 1560 TRANSFER |
| <input type="checkbox"/> 3025 INTERVENE | <input type="checkbox"/> 1561 VACATE DWP |
| <input type="checkbox"/> 1530 ISSUE JUDICIAL DEED | <input type="checkbox"/> 1562 VACATE ORDER |
| <input type="checkbox"/> 1531 JUDGMENT OF FORECLOSURE AND SALE | <input type="checkbox"/> 1563 VACATE SALE |
| <input type="checkbox"/> 1532 FILE APPEARANCE AND PLEADING | <input type="checkbox"/> 1564 WITHDRAW |
| <input type="checkbox"/> 1533 LIFT STAY | |