

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

JANE MILLER,
Plaintiff

v.

THOMAS DUNKERTON,
Defendant

:
:
:
:
:
:
:
:
:

NO.:

MAY 13, 2016

NOTICE OF REMOVAL

To the United States District Court for the District of Connecticut:

The Notice of **Thomas Dunkerton** respectfully shows:

1. The plaintiff has commenced an action against the defendant in the Superior Court for the judicial district of Danbury, by service of a Summons and Complaint dated April 27, 2016. The plaintiff served a copy of the Summons and Complaint upon the defendant on or about April 28, 2016. Pursuant to 28 U.S.C. § 1446(a), the undersigned defendant has attached said Summons and Complaint hereto.
2. The above-described action is one which may be removed to the Court by the petitioner, the undersigned defendant therein, pursuant to the provisions of 28 U.S.C. § 1331 and 28 U.S.C. § 1343(a)(3) in that the controversy involves a federal question and the alleged denial of plaintiff's rights under the First and Fourteenth Amendments.
3. Specifically, the Petition alleges that the plaintiff's constitutional rights were violated, including her right to due process of law and her right to freedom of association.

6. The action was returnable in the Superior Court for the judicial district of Danbury on May 3, 2016.
7. The undersigned defendant denies all of the plaintiff's allegations.
8. Accordingly, this Court has original jurisdiction of this action under 28 U.S.C. §§ 1331, 1343(a)(3) and supplemental jurisdiction pursuant to 28 U.S.C. § 1367. The action may be removed to this Court pursuant to 28 U.S.C. §§ 1441, 1443 and 1446.

WHEREFORE, the petitioner, Thomas Dunkerton, prays that the above action now pending in Connecticut Superior Court for the judicial district of Danbury be removed therefrom to this Court.

DEFENDANT,
THOMAS DUNKERTON

By /s/ Thomas R. Gerarde
Thomas R. Gerarde (ct05640)
Katherine E. Rule (ct27360)
Winifred E. Binda (ct29997)
Howd & Ludorf, LLC
65 Wethersfield Avenue
Hartford, CT 06114-11921
Ph: (860) 249-1361
Fax: (860) 249-7665
E-mail: tgerarde@hl-law.com
E-mail: krule@hl-law.com
E-mail: wbinda@hl-law.com

CERTIFICATION

This is to certify that on May 13, 2016, a copy of the foregoing *Notice of Removal* was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Neil Marcus
Alexander Copp
Cohen and Wolf, P.C.
158 Deer Hill Avenue
Danbury, CT 06810
acopp@cohenandwolf.com

/s/ Thomas R. Gerarde
Thomas R. Gerarde