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Attorneys for Defendant, KAI USA Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

MITCHELL SEAVEY,)
)
 Plaintiff,)
)
 vs.)
)
 KAI, USA LTD, d/b/a KERSHAW)
 KNIFE COMPANY; SPORTSMAN'S)
 WAREHOUSE, INC.,)
)
 Defendants.) Case No. _____
)
 _____)

**NOTICE OF REMOVAL OF CASE FROM STATE COURT
(SUPERIOR COURT NO. 4BE-11-00513 CIVIL)**

TO THE DISTRICT COURT OF THE UNITED STATES, DISTRICT OF ALASKA, AND TO PLAINTIFF AND HIS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that Defendant, KAI USA Ltd., d/b/a Kershaw Knife Company (hereinafter "Kershaw"), pursuant to 28 U.S.C. § 1446, and contemporaneous with the filing of this Notice, is effectuating the removal of the above-referenced action from the Superior Court of the State of Alaska, Fourth Judicial District, to

the United States District Court for the District of Alaska. The removal is based on the following grounds:

1. On or about December 19, 2011, there was filed in the Superior Court for the State of Alaska the above-titled action, Case No. 4BE-11-00513 CI.

2. On or about January 9, 2012, the Defendant was served with a copy of the Complaint, via certified mail, at the corporate offices of Defendant in Tualatin, Oregon.

3. A true and correct copy of the Complaint and Summons and Judicial Assignment are attached hereto as Exhibit A and is incorporated by reference herein as though fully set forth.

4. The United States District Court has jurisdiction over the superior court action in this matter, based on diversity of citizenship of the parties pursuant to 28 U.S.C. § 1332.

5. Plaintiff is a resident of Alaska. On information and belief, and without conceding same, Plaintiff's claims exceed \$75,000. See Complaint at ¶ 1; Prayer for Relief ¶ 1.

6. Defendant, Kershaw is a corporation organized under the laws of the state of Oregon with its principal place of business in Tualatin, Oregon. Its corporate citizenship is Oregon.

7. Defendant, Sportsman's Warehouse, Inc., is a corporation organized under the laws of the state of Utah with its principal place of business in Midvale, Utah. Its corporate citizenship is Utah.

8. This notice of removal is timely filed under 28 U.S.C. § 1446 as it is filed within 30 days of receipt of a copy of the complaint by Defendant Kershaw, which sets out a claim for relief.

9. Defendant Sportsman's Warehouse, Inc. expressly consents to this notice of removal. A copy of Sportsman's Warehouse, Inc.'s Written Consent for Removal is attached hereto as Exhibit B.

10. In compliance with 28 U.S.C. 1446(d), Kershaw: (i) hereby gives its written notice to Plaintiff of the removal; and (ii), is filing the *Notice to Superior Court of Filing Notice of Removal* attached as Exhibit C with the clerk of the state court contemporaneously with this notice in federal court.

DATED this 23rd day of January, 2012 at Anchorage, Alaska.

DELANEY WILES, INC.
Attorneys for Defendant
KAI USA Ltd.
d/b/a Kershaw Knife Company

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CERTIFICATE OF SERVICE

I hereby certify that on this
23rd day of January, 2012, a
copy of foregoing document was
served by mail on:

William H. Ingaldson
Ingaldson, Maassen & Fitzgerald, P.C.
813 West 3rd Avenue
Anchorage, AK 99501

John J. Tiemessen
Clapp, Peterson, Tiemessen, Thorsness & Johnson, LLC
411 Fourth Avenue, Suite 300
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/s/Cynthia L. Ducey
4814-5856-3086, v. 1