

Promark Sports Inc v. Jacksonville Jaguars, et al

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3:06-CV-01433 PROMARK SPORTS INC V. JACKSONVILLE JAGUARS

\*3\*

\*PRFSVC.\*

1 FOLEY & LARDNER LLP  
ATTORNEYS AT LAW  
2 402 W. BROADWAY, SUITE 2300  
SAN DIEGO, CA 92101-3542  
3 TELEPHONE: 619.234.6655  
FACSIMILE: 619.234.3510

FILED

06 JUL 21 PM 3: 35

4 WENDY L. TUCKER, BAR NO. 174407  
ATTORNEYS FOR DEFENDANT, JACKSONVILLE JAGUARS,  
LTD.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

5 BY:  DEPUTY,  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
10

11 PROMARK SPORTS, INC., A DELAWARE )  
CORPORATION, )

Case No. 06 CV 1433 WQH NLS

12 PLAINTIFF, )  
13 )

**CERTIFICATE OF SERVICE OF  
NOTICE TO ADVERSE PARTY**

14 v. )

15 JACKSONVILLE JAGUARS, LTD., A )  
FLORIDA LIMITED PARTNERSHIP; )  
16 JACKSONVILLE JAGUARS, A )  
PURPORTED FLORIDA CORPORATION, AND )  
17 DOES 1 THROUGH 25 INCLUSIVE, )

18 Defendant. )

19 I, the undersigned, certify and declare as follows:

20 1. I am over the age of 18 years and not a party to this action.

21 2. My business address is Foley & Lardner LLP, 402 W. Broadway, Suite  
22 2300, San Diego, California 92101.

23 3. On July 14, 2006, I personally served a copy of the Notice to Adverse Party  
24 of removal to Federal Court filed July 14, 2006, a copy of which is attached to this  
25 Certificate.

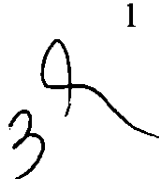
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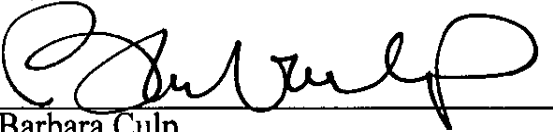
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CERTIFICATE OF SERVICE OF NOTICE TO  
ADVERSE PARTY OF REMOVAL TO FEDERAL  
COURT  
CASE NO. 06 CV 1433 WQH NLS

ORIGINAL



1 I declare under penalty of perjury under the laws of the State of California and the  
2 United States that the foregoing is true and correct.

3 Executed this 19<sup>th</sup> day of July, 2006 at San Diego, California.

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5 \_\_\_\_\_  
6 Barbara Culp

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1 FOLEY & LARDNER LLP  
ATTORNEYS AT LAW  
402 W. BROADWAY, SUITE 2300  
2 SAN DIEGO, CA 92101-3542  
TELEPHONE: 619.234.6655  
3 FACSIMILE: 619.234.3510

4 WENDY L. TUCKER, BAR NO. 174407  
ATTORNEYS FOR DEFENDANT, JACKSONVILLE JAGUARS,  
LTD..

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

10 PROMARK SPORTS, INC., A  
11 DELAWARE CORPORATION,

12 PLAINTIFF,

13 v.

14 JACKSONVILLE JAGUARS, LTD., A  
FLORIDA LIMITED PARTNERSHIP;  
15 JACKSONVILLE JAGUARS, A  
PURPORTED FLORIDA CORPORATION AND  
16 DOES 1 THROUGH 25, INCLUSIVE,

17 DEFENDANTS.

Case No. GIC 867460

**NOTICE TO ADVERSE PARTY**

18 TO: Clerk of the Superior Court for the  
19 County of San Diego, Central Division  
330 West Broadway  
20 San Diego, CA 92101

21 Jamie A. Moran  
402 West Broadway, Suite 400  
22 San Diego, CA 92101

23 PLEASE TAKE NOTICE that on July 14, 2006, Defendant Jacksonville  
24 Jaguars, Ltd., filed a Notice of Removal of this action under 28 U.S.C. §1332 to  
25 the United States District Court for the Southern District of California, Case No. 06  
26 CV 1433 WQH NLS, a true and correct copy of which is attached hereto as Exhibit  
27 "1." No other process, order or other pleading in this action has been received or  
28 filed by defendant to date.

1 Pursuant 28 U.S.C. § 1446(d), no further proceedings shall occur in this  
2 court unless and until the case is remanded.

3  
4 Dated: July 14, 2006

FOLEY & LARDNER LLP

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7 Wendy L. Tucker

8 Attorneys for Defendant,

9 JACKSONVILLE JAGUARS, LTD.

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**PROOF OF SERVICE**

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to this action; my current business address is 402 W. Broadway, Suite 2300, San Diego, CA 92101-3542.

On July 14, 2006, I served the foregoing document(s) described as:

- 1. NOTICE TO ADVERSE PARTY
- 2. DEFENDANT JACKSONVILLE JAGUARS, LTD.'S NOTICE OF PARTY WITH FINANCIAL INTEREST AND CORPORATE DISCLOSURE STATEMENT PURSUANT TO F.R.C.P. 7.1 AND LOCAL RULE 40.2

on the interested parties in this action as follows:

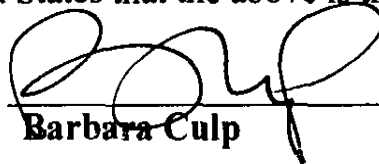
BY THE FOLLOWING MEANS:  
I placed a true copy thereof enclosed in sealed envelope(s) addressed as follows:

**Jamie A. Moran**  
402 West Broadway, Suite 400  
San Diego, CA 92101

BY HAND DELIVERY. I delivered the envelope(s) by hand to addressee(s).

Executed on July 14, 2006, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California and the United States that the above is true and correct.

  
Barbara Culp