

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

LAUREN DONINGER, PPA  
AVERY DONINGER

:  
:

NO.:

v.

:

KARISSA NIEHOFF AND  
PAULA SCHWARTZ

:  
:

JULY 26, 2007

**NOTICE OF REMOVAL**

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

Pursuant to 28 U.S.C. §§1441, 1443 and 1446, the defendants hereby give notice that they have removed this action from the Superior Court of Connecticut, Judicial District of New Britain at New Britain for the following reasons:

1. Plaintiffs have commenced an action against the defendants in the Judicial District of New Britain at New Britain, by service of a Summons and Complaint dated July 16, 2007. The plaintiff served a copy of the Summons and Complaint upon each defendant individually on or after July 16, 2007. Pursuant to 28 U.S.C. §1446(a), the defendants have attached said Summons and Complaint hereto.

2. The above-described action is a civil action and is one which may be removed to the Court by the defendant pursuant to the provisions of Title 28, United States Code §§1441, 1331 and 1343(3), in that the Complaint alleges a violation of

civil rights and a violation of the plaintiff's rights under the First Amendment, involving a federal question. The controversy arises under the said statutes.

3. The action is returnable in the Superior Court for the Judicial District of New Britain at New Britain on August 14, 2007.

4. Attached hereto, in compliance with 28 U.S.C. §1446(a), are complete and accurate copies of the process and pleadings received by the defendants to date.

5. The defendants deny all of plaintiff's allegations.

6. Accordingly, this Court has original jurisdiction of this action under 28 U.S.C. §§1331, 1343(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 petitioners pray that the above action now pending in the Superior Court of New Britain at New Britain be removed therefrom to this Court.

DEFENDANTS,  
KARISSA NIEHOFF AND  
PAULA SCHWARTZ

By /s/ Katherine E. Rule  
Katherine E. Rule  
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Howd & Ludorf, LLC  
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**CERTIFICATION**

This is to certify that a copy of the foregoing has been sent, handling charges prepaid, via U.S. Mail, to the following counsel of record this 26<sup>th</sup> day of July, 2007.

Jon L. Schoenhorn, Esquire  
Jon L. Schoenhorn & Associates, LLC  
108 Oak Street  
Hartford, CT 06106

/s/ Katherine E. Rule  
Katherine E. Rule