COMMONWEALTH OF KENTUCKY JEFFERSON CIRCUIT COURT DIVISION THREE (3) CASE NO. 11-CI-07966

PAUL R. SCHURMAN

v.

REED ELSEVIER, INC.

NOTICE OF FILING OF NOTICE OF REMOVAL

* * * * * *

PLEASE TAKE NOTICE that on January 13, 2012, Defendant LexisNexis, a div. of Reed Elsevier Inc.,¹ ("LexisNexis"), by counsel, removed this action by filing a Notice of Removal in the United States District Court for the Western District of Kentucky, together with a complete copy of all process, pleadings, and orders served, filed, or entered in the state court action as of the date of the filing of the removal. A complete, true and correct copy of such Notice of Removal, without exhibits, is attached hereto as Exhibit A.

Respectfully submitted,

Richard H.C. Clay Anthony M. Zelli DINSMORE & SHOHL LLP 101 South Fifth Street Suite 2500 Louisville, Kentucky 40202 Phone: (502) 581-8000 Fax: (502) 581-8111 Counsel for Defendant LexisNexis, a div. of Reed Elsevier Inc.

PLAINTIFF

DEFENDANT

¹ The proper defendant in this action is LexisNexis, a div. of Reed Elsevier Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent to the following by U.S. Mail, postage prepaid, on this 13th day of January, 2012:

Donald L. Cox John D. Cox Lynch, Cox, Gilman & Goodman, P.S.C. 500 West Jefferson Street, Suite 2100 Louisville, Kentucky 40202 *Counsel for Plaintiff*

elli-Counsel for Defendant

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