

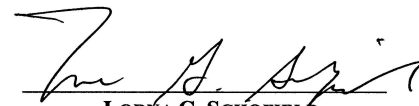
LAW FIRM OF ELEANOR VALE
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Attorney for Plaintiff

Plaintiff's motion to remand the case to New York state court is DENIED for failure to comply with Individual Rule III.A.3. Pursuant to Individual Rule III.A.3, by **September 10, 2021**, Plaintiff shall file a pre-motion letter not to exceed three single-space pages citing the controlling authorities that Plaintiff contends would warrant granting the motion.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 7.

UNITED STATES DISTRICT COURT Dated: September 7, 2021
SOUTHERN DISTRICT OF NEW YORK New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

	:	Civil Action No. 21-cv-7223
VALMONT, INC.,	:	
Plaintiff	:	
-against-	:	
VF CORPORATION, INC., VFO, INC., and	:	
KONTOOR BRANDS, INC.	:	
Defendants	:	

**NOTICE OF MOTION TO REJECT REMOVAL MOTION and/or FOR
TRANSFER BACK TO SUPREME COURT**

PLEASE TAKE NOTICE that Plaintiff, VALMONT, INC. pursuant to Rules 7 and 11 of the FRCP and the motion rules of the Honorable Lorna Schofield, upon the accompanying affidavit of Nicholas Vale; the Declaration of Eleanor Vale, attorney for plaintiff, with exhibits annexed thereto; Memorandum of Law and all prior pleadings heretofore filed by plaintiff's counsel, will move this Court before the Honorable Lorna Schofield., United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, on a date and at a time to be designated by the Court, for an Order: (i) denying VFCorp motion for Removal; (ii) granting plaintiff's motion for allowing case to stay in/or transfer back to Supreme Court; (iii) awarding plaintiff all costs and attorney's fees incurred in connection with the instant action and

this motion; and (iii) granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
Sept.1, 2021

Respectfully submitted

/s/ Eleanor Vale

Eleanor Vale

To: Sheppard Mullin Richter & Hampton, LLP
30 Rockefeller Plaza, New York, NY 10112
Attn: Tyler E. Baker
Email: tbaker@sheppardmullin.com
BY EMAIL only

THE HONORABLE NANCY M. BANNON
Supreme Court of the State of New York
Index No.: 654048/2021 Filed 6/25/20