

IN THE COURT OF COMMON PLEAS CUYAHOGA COUNTY, OHIO

MARY JANE COLSTON, : CASE NO. CV-10-772326

: JUDGE RONALD SUSTER

:

Plaintiff,

v.

CLEVELAND PUBLIC LIBRARY, FELTON THOMAS, MELVIN ABRAMS, MICHAEL JANERO, SHARON TUFTS, et al.

Defendants.

NOTICE OF FILING NOTICE OF REMOVAL

TO THE JUDGES OF THE COURT OF COMMON PLEAS FOR CUYAHOGA COUNTY, OHIO AND TO ALL PARTIES TO THE ACTION HEREIN:

PLEASE TAKE NOTICE that on January 27, 2012, Defendants Cleveland Public Library ("CPL"), Felton Thomas ("Thomas"), Michael Janero ("Janero") and Sharon Tufts ("Tufts") (collectively, "Defendants") filed a *Notice of Removal* of this action to the United States District Court for the Northern District of Ohio, Eastern Division, pursuant to the provisions of 28 U.S.C. § 1331. A true and correct copy of the *Notice of Removal* is attached hereto as **Exhibit 1**.

You are further advised that Defendants, upon filing said *Notice of Removal* in the Office of the Clerk of the United States District Court for the Northern District of Ohio, Eastern Division, also filed and served this notice to effectuate removal pursuant to 28 U.S.C. § 1446(d).

Colston v. Cleveland Publ

DATED: January 27, 2012

Respectfully submitted,

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Attorneys for Defendants Cleveland Public Library, Felton Thomas, Michael Janero and Sharon Tufts

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Notice of Filing Notice of Removal was sent by regular U.S. mail on this 27th day of January, 2012 to the following:

Steven J. Moody, Esq. 1370 Ontario Street Suite 1240 Cleveland, Ohio 44101 Attorney for Plaintiff

Melvin H. Abrams 677 Trebisky Road Cleveland, Ohio 44143 Defendant

> One of the Attorneys for Defendants Cleveland Public Library, Felton Thomas, Michael Janero

and Sharon Tufts

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