

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

)	
ASHLEY STAMM-NORTHUP, aka)	No.
“DANICA DILLON,”)	
Plaintiff)	
)	JURY TRIAL DEMANDED
v.)	CIVIL ACTION - LAW
)	
JOSHUA JAMES DUGGAR, aka)	
“JOSH DUGGAR,”)	
Defendant)	

DEFENDANT’S NOTICE OF REMOVAL

Defendant, Joshua Duggar (“Defendant”), files this Notice of Removal pursuant to 28 U.S.C. 1441(a) and (b) to remove this action from the Court of Common Pleas Philadelphia County, November Term, 2015, Case No.: 002503, in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania and in support thereof states as follows:

1. On or about November 17, 2015, Plaintiff filed a Complaint in the Court of Common Pleas of Philadelphia County (“the County Action”) which was issued by the Clerk of said Court and served upon Defendant on or about November 23, 2015. A Copy of the Complaint is attached to this Notice of Removal as Exhibit 1.
2. In the Complaint, Plaintiff alleges she was battered by Defendant and suffered physical and emotional injuries in March and April 2015 at various

locations in the Eastern District of Pennsylvania. See Ex. 1. Plaintiff seeks in excess of \$500,000 in her Complaint. See Ex. 1 “Wherefore” Clause.


3. Defendant therefore has a good faith belief that Plaintiff is seeking damages in excess of \$75,000 and the jurisdictional requirement for removal is now met.
4. Removal from the Court of Common Pleas, Philadelphia County is proper under 28 U.S.C. § 1441(b) which authorizes the removal of any civil action if “none of the parties in interest properly joined and served as a defendant is a citizen of the state in which the action is brought.”
5. Defendant is a citizen of the state of Arkansas. The alleged incidents allegedly occurred in Philadelphia and Montgomery County, Pennsylvania. Upon information and belief, Plaintiff is a citizen of California. In any event, Plaintiff is not a citizen of Arkansas.

WHEREFORE, Defendant respectfully requests that the County Action be removed from the Court of Common Pleas for Philadelphia County to the United States District Court for the Eastern District of Pennsylvania.

Respectfully Submitted:

CLYMER CONRAD PC

Date: 12/23/15



Jeffrey A. Conrad, Esquire
Supreme Court I.D. No. 85156
408 West Chestnut Street
Lancaster, PA 17603
Phone: 717-299-7101
Fax: 717-299-5115
Jeff.Conrad@clymerlaw.com

VERIFICATION

Jeffrey A. Conrad, Esquire, hereby verifies that he is the attorney of record for Defendant and is authorized to make this verification on his behalf and that the facts alleged in the Notice of Removal are true and correct to the best of my knowledge and belief. I understand that false statements herein are subject to the penalties of 28 USC § 1746 relating to unsworn declarations under penalty of perjury.

Date: 12/23/15



Jeffrey A. Conrad

EXHIBIT 1

Court of Common Pleas of Philadelphia County
Trial Division

Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

NOVEMBER 2015

002503

E-Filing Number. 1511035393

PLAINTIFF'S NAME
ASHLEY STAMM-NORTHUP, ALIAS: DANICA DILLON

DEFENDANT'S NAME
JOSHUA JAMES. DUGGAR, ALIAS: JOSH DUGGAR

PLAINTIFF'S ADDRESS
10183 GLENNON STREET
SAN DIEGO CA 92124

DEFENDANT'S ADDRESS
4149 SAFFORD ROAD
ROCKFORD IL 61101

PLAINTIFF'S NAME

DEFENDANT'S NAME

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS

PLAINTIFF'S NAME

DEFENDANT'S NAME

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS

1

TOTAL NUMBER OF DEFENDANTS

1

COMMENCEMENT OF ACTION

- Complaint Petition Action Notice of Appeal
 Writ of Summons Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY

- \$50,000.00 or less
 More than \$50,000.00

COURT PROGRAMS

- Arbitration
 Jury
 Non-Jury
 Other:

- Mass Tort
 Savings Action
 Petition

- Commerce
 Minor Court Appeal
 Statutory Appeals

- Settlement
 Minors
 W/D/Survival

CASE TYPE AND CODE

2B - ASSAULT, BATTERY

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED
PRO PROTHY**

NOV 17 2015

D. SAVAGE

IS CASE SUBJECT TO
COORDINATION ORDER?
YES NO

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: ASHLEY STAMM-NORTHUP

Papers may be served at the address set forth below.

NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY

MARC J. FRUMER

ADDRESS

4961 OXFORD AVE
PHILADELPHIA PA 19124

PHONE NUMBER

(215) 535-6900

FAX NUMBER

(215) 535-7800

SUPREME COURT IDENTIFICATION NO.

55271

E-MAIL ADDRESS

mjf_esquire@verizon.net

SIGNATURE OF FILING ATTORNEY OR PARTY

MARC FRUMER

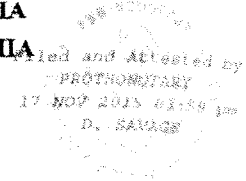
DATE SUBMITTED

Tuesday, November 17, 2015, 03:59 pm

FINAL COPY (Approved by the Prothonotary Clerk)

Scanned by CamScanner

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA



MARC J. FRUMER, ESQUIRE
IDENTIFICATION NO: 55271
4961 OXFORD AVENUE
PHILADELPHIA, PA 19124
(215) 535-6900
mjf_esquire@verizon.net

ATTORNEY FOR PLAINTIFF

ASHLEY STAMM-NORTHUP
A/K/A DANICA DILLON
10183 Glenmon Street
San Diego, California 92124

Plaintiff

vs.

JOSHUA JAMES DUGGAR
A/K/A JOSH DUGGAR
4149 Safford Road
Rockford, Illinois 61101

Defendant

COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA
CIVIL DIVISION

TERM

NO.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

MARC J. FRUMER, ESQUIRE
IDENTIFICATION NO: 55271
4961 OXFORD AVENUE
PHILADELPHIA, PA 19124
(215) 535-6900

STATE BAR OF PHILADELPHIA

ATTORNEY FOR PLAINTIFF

ASHLEY STAMM-NORTHUP
A K A DANICA DILLON
10183 Glennon Street
San Diego, California 92124
Plaintiff

vs.

JOSHUA JAMES DUGGAR
A K A JOSH DUGGAR
4149 Safford Road
Rockford, Illinois 61101
Defendant

COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA
CIVIL DIVISION

TERM

NO.

COMPLAINT - CIVIL ACTION

I. Introduction.

1. Plaintiff, Ashley Stamm-Northup, age 28, D.O.B. January 4, 1987, is a married mother of two small children. She is a resident of San Diego, California. Plaintiff is also known as Danica Dillon.

2. Defendant, Joshua James Dugger, age 27, D.O.B. March 3, 1988, is a resident of Reformer's Unanimous Men's School of Discipleship in Rockford, Illinois. Defendant is also known as Josh Duggar.

Case ID: 151102503

II. Defendant committed a battery upon the Plaintiff twice.

3. All previous paragraphs are incorporated herein.

4. Defendant approached Plaintiff, on or about March 12, 13, & 14, 2015, at The Gold Club, a "gentlemen's club" and bar, located at 1416 Chancellor Street in Philadelphia, additionally, on or about April 17 & 18, 2015, at the Creekside Cabaret.

5. Plaintiff was the featured performer at The Gold Club on this particular evening. Plaintiff is a movie actress in both adult and mainstream films. Plaintiff is also a model and spokesperson for several companies. Her employment includes making public appearances as well as acting. On this particular night she was the featured performer and was advertised as such.

6. During her appearance, Defendant requested Plaintiff for several "lap dances" for which he paid the club approximately \$600.

7. After her performance at The Gold Club, Defendant continued to pursue Plaintiff, following her to the DoubleTree Hotel where she was staying.

8. Defendant then propositioned Plaintiff for consensual sex. Defendant paid Plaintiff \$1,500 for her company.

9. Once inside the Plaintiff's hotel room, Defendant manhandled Plaintiff and physically assaulted her to the point of causing her physical and emotional injuries. Indeed, Plaintiff felt as if she were being raped by the Defendant. This was not part of any agreement and clearly exceeded the scope of any consent by the Plaintiff.

10. Defendant intended to cause such harmful and offensive contact with the Plaintiff and directly, through his tortious actions and conduct caused Plaintiff to suffer severe emotional and physical injuries.

11. Defendant subsequently attempted to "apologize" for the tortious battery he inflicted upon the Plaintiff. This apology occurred at the Creekside Cabaret. However, his motive for his "apology" was to deceive Plaintiff into another private meeting with her where he engaged in identical tortious conduct causing Plaintiff to suffer severe emotional and physical damages.

12. As a direct result of Defendant's actions, Plaintiff has suffered serious emotional and physical damages. She is currently being treated by a psychiatrist for severe anxiety, similar to post-traumatic stress disorder ("PTSD"), and has suffered physical injuries as well. Further, Plaintiff has been unable to work in her chosen field as a direct consequence of Defendant's actions.

WHEREFORE, Plaintiff demands that Defendant be found liable for intentional battery of Plaintiff and requests damages in excess of \$500,000 be imposed upon Defendant.

III. Defendant caused intentional emotional distress via his outrageous tortious conduct upon Plaintiff.

13. All previous paragraphs are incorporated herein.

14. As previously stated above, Defendant engaged in violent and outrageous conduct causing severe emotional distress to Plaintiff. Plaintiff has suffered severe emotional and physical injuries due to Defendant's violent and outrageous conduct.

15. As a direct result of Defendant's actions, Plaintiff has suffered considerable emotional and physical damages. Plaintiff is currently being treated for severe anxiety similar to PTSD by a psychiatrist due to Defendant's violent and outrageous conduct. Further, Plaintiff has been unable to work in her chosen field as a direct consequence of Defendant's actions.

WHEREFORE, Plaintiff demands that Defendant be found liable for intentional infliction of emotional distress due to his outrageous and violent conduct towards Plaintiff and further, Plaintiff requests damages in excess of \$500,000 be imposed upon Defendant.

Respectfully submitted,



MARC J. FRUMER, ESQUIRE
Counsel for Plaintiff
Ashley Stamm-Northup

VERIFICATION

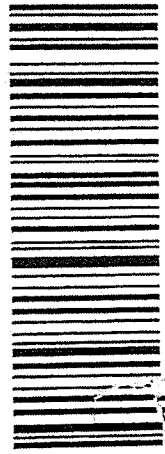
The undersigned verifies that the statements made in the foregoing pleading are true and correct to the best of his belief and understands that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

Date: Nov 17 2015

Marc J. Frumer
MARC J. FRUMER, ESQUIRE

MARC J FRUMER
ATTORNEY AT LAW
4961 OXFORD AVE
PHILADELPHIA PA, 19124
RETURN RECEIPT
REQUESTED

CERTIFIED MAIL



7015 0640 0003 8005 1015

JOSHUA JAMES DUGGAR
4149 Safford Road
Rockford, IL 61101



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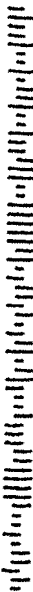


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CP#7

Commonwealth of Pennsylvania
CITY AND COUNTY OF PHILADELPHIA

SUMMONS
CITACION

COURT OF COMMON PLEAS

ASHLEY STAMM-NORTHUP
A/K/A DANICA DILLON
Plaintiff

NOVEMBER TERM, 2015

NO. 002503

vs.

JOSHUA JAMES DUGGAR
A/K/A JOSH DUGGAR
Defendant

To⁽¹⁾

JOSHUA JAMES DUGGAR
A/K/A JOSH DUGGAR
4149 Safford Road
Rockford, Illinois 61101

You are notified that the Plaintiff⁽²⁾
Usted esta avisado que el demandante⁽²⁾

ASHLEY STAMM-NORTHUP
A/K/A DANICA DILLON
10183 Glennon Street
San Diego, California 92124

Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



JOSEPH H. EVERS
Prothonotary

By *Joseph Evers*

Date DECEMBER 9, 2015

⁽¹⁾ Name(s) of Defendant(s)
⁽²⁾ Name(s) of Plaintiff(s)

COURT OF COMMON PLEAS

November Term, 20 15 No. 002503



Ashley Stamm-Northup
A/K/A Danica Dillon
Plaintiff

vs.

Joshua James Duggar
A/K/A Josh Duggar
Defendant

SUMMONS

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

NOVEMBER 2015

002503

E-Filing Number 1511035393

PLAINTIFF'S NAME
ASHLEY STAMM-NORTHUP, ALIAS: DANICA DILLON

DEFENDANT'S NAME
JOSHUA JAMES. DUGGAR, ALIAS: JOSH DUGGAR

PLAINTIFF'S ADDRESS
10183 GLENNON STREET
SAN DIEGO CA 92124

DEFENDANT'S ADDRESS
4149 SAFFORD ROAD
ROCKFORD IL 61101

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TOTAL NUMBER OF PLAINTIFFS

TOTAL NUMBER OF DEFENDANTS

COMMENCEMENT OF ACTION

1

1

Complaint Petition Action Notice of Appeal
 Writ of Summons Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY

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\$50,000.00 or less
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Arbitration
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CASE TYPE AND CODE

2B - ASSAULT, BATTERY

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED
PRO PROTHY**

IS CASE SUBJECT TO
COORDINATION ORDER?
YES NO

NOV 17 2015

D. SAVAGE

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Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: ASHLEY STAMM-NORTHUP

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NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY

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ADDRESS

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PHILADELPHIA PA 19124

PHONE NUMBER

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FAX NUMBER

(215) 535-7800

SUPREME COURT IDENTIFICATION NO

55271

E-MAIL ADDRESS

mjf_esquire@verizon.net

SIGNATURE OF FILING ATTORNEY OR PARTY

MARC FRUMER

DATE SUBMITTED

Tuesday, November 17, 2015, 03:59 pm

FINAL COPY (Approved by the Prothonotary Clerk)

Scanned by CamScanner

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA

MARC J. FRUMER, ESQUIRE
IDENTIFICATION NO: 55271
4961 OXFORD AVENUE
PHILADELPHIA, PA 19124
(215) 535-6900
mjf_esquire@verizon.net

ATTORNEY FOR PLAINTIFF

ASHLEY STAMM-NORTHUP
A/K/A DANICA DILLON
10183 Glenmon Street
San Diego, California 92124

Plaintiff

vs.

JOSHUA JAMES DUGGAR
A/K/A JOSH DUGGAR
4149 Safford Road
Rockford, Illinois 61101

Defendant

COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA
CIVIL DIVISION

TERM

NO.

NOTICE TO DEFEND

NOTICE

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De Filadelfia
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One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
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mjf_esquire@verizon.net

ATTORNEY FOR PLAINTIFF

ASHLEY STAMM-NORTHUP
A K/A DANICA DILLON
10183 Glennon Street
San Diego, California 92124
Plaintiff

vs.

JOSHUA JAMES DUGGAR
A K/A JOSH DUGGAR
4149 Safford Road
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COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA
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TERM

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2. Defendant, Joshua James Dugger, age 27, D.O.B. March 3, 1988, is a resident of Reformer's Unanimous Men's School of Discipleship in Rockford, Illinois. Defendant is also known as Josh Duggar.

Case ID: 151102503

11. Defendant committed a battery upon the Plaintiff twice.

3. All previous paragraphs are incorporated herein.

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WHEREFORE, Plaintiff demands that Defendant be found liable for intentional battery of Plaintiff and requests damages in excess of \$500,000 be imposed upon Defendant.

III. Defendant caused intentional emotional distress via his outrageous tortious conduct upon Plaintiff.

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Respectfully submitted,



MARC J. FRUMER, ESQUIRE
Counsel for Plaintiff
Ashley Stamm-Northup

VERIFICATION

The undersigned verifies that the statements made in the foregoing pleading are true and correct to the best of his belief and understands that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

Date:

11/19/20

Marc J. Frumer
MARC J. FRUMER, ESQUIRE

Case ID: 151102503

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**


ASHLEY STAMM-NORTHUP, aka "DANICA DILLON," Plaintiff)	No.
)	
v.)	JURY TRIAL DEMANDED CIVIL ACTION - LAW
)	
JOSHUA JAMES DUGGAR, aka "JOSH DUGGAR," Defendant)	
)	

CERTIFICATE OF SERVICE

I, Jeffrey A. Conrad, Esq. hereby certify that on December 23, 2015, I caused a true and correct copy of the foregoing Notice of Removal to be filed with (1) the U.S. District Court for the Eastern District of Pennsylvania via hand delivery and served, via United States first-class mail, postage prepaid upon:

Mr. Marc Frumer, Esq.
4961 Oxford Ave.
Philadelphia, PA 19124

Respectfully Submitted:

CLYMER CONRAD PC


Jeffrey A. Conrad, Esquire
Supreme Court I.D. No. 85156
408 West Chestnut Street
Lancaster, PA 17603
Phone: 717-299-7101
Fax: 717-299-5115
Jeff.Conrad@clymerlaw.com

Date: 12/23/15