

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

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**TENNESSEE FOOTBALL, INC.,**

**Plaintiff,**

**v.**

**LANE MONTE KIFFIN, INDIVIDUALLY  
AND IN HIS CAPACITY AS AGENT FOR  
UNIVERSITY OF SOUTHERN  
CALIFORNIA; and UNIVERSITY OF  
SOUTHERN CALIFORNIA;**

**Defendants.**

**Case No.** \_\_\_\_\_

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**NOTICE OF REMOVAL**

Please take notice that, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, the defendants in this case, Lane Monte Kiffin and the University of Southern California (collectively “Defendants”) hereby remove to this Court the action styled *Tennessee Football, Inc. v. Lane Monte Kiffin, Individually and in his Capacity as Agent for University of Southern California; and University of Southern California*, Case No. 10-1197-II, filed in the Chancery Court for the Twentieth Judicial District, at Nashville, Davidson County, Tennessee. The grounds of removal are as follows:

1. Plaintiff Tennessee Football, Inc. (“Plaintiff”) commenced this action in the Chancery Court for the Twentieth Judicial District, at Nashville, Davidson County, Tennessee, by filing a Complaint (the “Complaint”) on July 26, 2010. A true and correct copy of each Summons and the Complaint served on Defendants is attached hereto as Exhibit 1.

2. Plaintiff is a corporation organized pursuant to the laws of the State of Delaware with its principal place of business in Nashville, Tennessee. (Complaint ¶ 1.)

3. Defendant Lane Monte Kiffin is, and has been since the filing of the Complaint, a citizen of the State of California.

4. Defendant University of Southern California is a non-profit public benefit corporation organized pursuant to the laws of the State of California with its principal place of business in Los Angeles, California and no other state.

5. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332 because complete diversity of citizenship has existed between the parties at the times of the filing of this action and of removal, and because Plaintiff has demanded, and the amount of controversy is, more than \$75,000. (*See, e.g.*, Complaint ¶ 18.)

6. Plaintiff filed this action on July 26, 2010. Plaintiff's counsel provided a copy of the Complaint to the University of Southern California on July 27, 2010.

7. Defendants file this Notice of Removal under 28 U.S.C. § 1446(b) within thirty (30) days after having received a copy of the initial pleading setting forth Plaintiff's claims for relief. This Notice of Removal is timely filed.

8. Removal is therefore proper pursuant to 28 U.S.C. §§ 1441 and 1446.

9. Promptly upon the filing of this Notice of Removal, Defendants will provide to Plaintiff a true and correct copy of this Notice of Removal pursuant to 28 U.S.C. § 1446(d).

10. Upon the filing of this Notice of Removal, Defendants will promptly file a Notification of Notice of Removal with the Clerk of the Chancery Court for the Twentieth Judicial District, at Nashville, Davidson County, Tennessee.

11. Defendants expressly reserve their defenses and claims.

WHEREFORE, Defendants hereby give notice of the removal of this action from the Chancery Court for the Twentieth Judicial District, at Nashville, Davidson County, Tennessee, to this Honorable Court in accordance with the provisions of 28 U.S.C. §§ 1441 and 1446.

Respectfully submitted,



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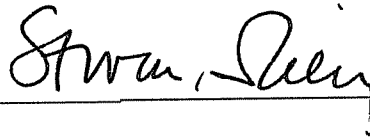
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*Attorneys for Defendants Lane Monte Kiffin and the  
University of Southern California*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 30<sup>th</sup> day of July 2010, service of the foregoing document was made using the Court's Electronic Filing System upon the following:

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