

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

LARRY KLAYMAN

Plaintiff,

v.

JULIA PORTER et al,

Defendants.

Case Number: 9:22-cv-80642-DMM

**NOTICE OF INTENT TO FILE MOTION TO REMAND AND MOTION TO STAY  
DEFENDANTS' MOTION TO DISMISS AND MOTION TO CONSOLIDATE**

Plaintiff Larry Klayman ("Mr. Klayman") hereby informs the Court that he will be filing a Motion to Remand on or before May 25, 2022, thirty (30) days from when the Defendants improperly, and without any legal basis removed this action from the 15<sup>th</sup> Judicial Circuit in and for Palm Beach County ("State Court") in a transparent attempt at forum shopping and seeking a more favorable venue.

It is indisputable that the amount in controversy here does not exceed the jurisdictional threshold of \$75,000 which is a requirement for federal court jurisdiction under 28 U.S.C. § 1332. This is because Mr. Klayman's Complaint does not seek damages, and is for injunctive and equitable relief only. See ECF No 1-2. And, since there is clearly no federal question at issue, there is simply no basis for this Court, or any federal court, to have jurisdiction over this case. This will be set forth fully in Mr. Klayman's forthcoming Motion to Remand. However, suffice it to say that just on its face alone, Defendants had absolutely no basis to remove this action from the State Court, and the Court should *sua sponte* sanction Defendants for their bad

faith, dishonesty and abuse of the court's process and refer this matter to appropriate bar authorities.

Since this Court has no jurisdiction over this case if it is not sua sponte sent back to state court, Mr. Klayman respectfully requests that the Court stay (1) Defendants' Motion to Dismiss, ECF No. 5, and (2) Defendants' Motion to Consolidate, ECF No. 4, until the issue of removal/remand has been settled and decided. This will allow for the Court's as well as the parties' limited time and resources to be conserved and not wasted as a result of Defendants' and their counsel's illegal and unethical conduct.

Dated: April 27, 2022

Respectfully submitted,

/s/ Larry Klayman

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*Pro Se*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on April 27, 2022.

/s/ Larry Klayman