

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

MARYLAND SHALL ISSUE, INC., *et al.* *
*
Plaintiffs, *
*
v. *
*
MONTGOMERY COUNTY, MD *
*
Defendant *

Civil No. 8:21-cv-01736-TDC

DEFENDANT’S STATEMENT PURSUANT TO ORDER CONCERNING REMOVAL

Defendant, Montgomery County, Maryland, by and through undersigned counsel, hereby files this Statement Pursuant to Order Concerning Removal and states:

1. The date(s) on which defendant was served with a copy of the summons and complaint: **Defendant Montgomery County, Maryland was served on June 10, 2021.**

2. In actions predicated on diversity jurisdiction, an indication of whether any defendants who have been served are citizens of Maryland, and, for any entity that is not a corporation, the citizenship of all members: **This action is not predicated on diversity jurisdiction.**

3. If removal takes place more than thirty (30) days after any defendant was first served with a copy of the summons and complaint, the reasons why removal has taken place at this time and the date on which the defendant(s) was (were) first served with a paper identifying the basis for such removal: **Removal is within 30 days after Defendant was first served with a copy of the summons and complaint.**

4. In actions removed to this court predicated on diversity jurisdiction in which the action in state court was commenced more than one year before the date of removal, the reasons

why this action should not be summarily remanded to state court: **This action is not predicated on diversity jurisdiction.**

5. Identification of any defendant who was served in the state court action prior to the time of removal who did not formally join in the notice of removal and the reasons: **N/A**

Respectfully submitted,

MARC P. HANSEN
COUNTY ATTORNEY

/s/

Patricia Lisehora Kane, Chief
Litigation Division
Federal Bar No. 13621
patricia.kane@montgomerycountymd.gov

/s/

Edward B. Lattner, Chief
Government Operations Division
Federal Bar No. 03871
edward.lattner@montgomerycountymd.gov

/s/

Sean C. O'Hara
Federal Bar No. 20725
sean.ohara@montgomerycountymd.gov

Attorneys for Defendant
101 Monroe Street, Third Floor
Rockville, Maryland 20850
(240) 777-6700