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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

<p>RALAND J. BRUNSON,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>SONIA SOTOMAYOR, ELENA KAGAN, KETANJI BROWN JACKSON, in their official capacities as Justices of the Supreme Court of the United States, and JOHN and JANE DOES 1-100,</p> <p style="text-align: center;">Defendants.</p>	<p><b>NOTICE OF REMOVAL PURSUANT TO 28 U.S.C. § 1442(a)</b></p> <p>Case No. 1:23-cv-00042</p> <p>Formerly Utah State Court Case No. 230901367</p>
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Defendants Sonia Sotomayor, Elena Kagan, and Ketanji Brown Jackson (collectively Defendants), through undersigned counsel, hereby submit this notice of removal of the above-captioned civil action from the Second Judicial District in the State of Utah, to the United States District Court for the District of Utah, pursuant to [28 U.S.C. § 1442\(a\)](#), and in support state:

1. On March 7, 2023, plaintiff Raland Brunson filed a complaint against Defendants, in their official capacities as Associate Justices of the United States Supreme Court, in the Second Judicial District, Case No. 230901367. Plaintiff asserts claims for breach of contract, intentional infliction of emotional distress, fraud, and civil conspiracy. Plaintiff's claims are

premised on the Supreme Court's denial of his petition for writ of certiorari in *Brunson v. Adams, et al.*, No. 22-380.

2. A copy of the complaint in the state court is attached as Exhibit A, in accordance with 28 U.S.C. § 1446(a). Neither a summons nor a complaint has been served on the United States Attorney's Office.

3. Pursuant to 28 U.S.C. § 1442(a)(3), any civil action commenced in a state court against officers of the courts of the United States that relates to the performance of their duties may be removed to the district court for the district and division embracing the place where the state court action is pending. Thus, because Defendants are officers of the Supreme Court of the United States and plaintiff asserts claims against them in their official capacities as Associate Supreme Court Justices, removal under § 1442(a)(3) is appropriate.

4. Accordingly, pursuant to 28 U.S.C. §§ 1442(a) and 1446(a), this Notice of Removal is being filed in the United States District Court for the District of Utah, within which plaintiff filed the state court action.

5. In accordance with 28 U.S.C. § 1446(a) and DUCivR 81-2(b)(2), a copy of the state court docket is attached as Exhibit B. No scheduling order has been entered in the state court action.

6. Upon the filing of this Notice of Removal, Defendants will timely file a copy of the Notice with the clerk of the State Court in which the action is pending, and notice shall be given to all adverse parties, pursuant to 28 U.S.C. § 1446(d).

7. By removing this case to federal court, Defendants do not waive any available defense, nor do they admit any allegations in the Complaint.

WHEREFORE, this action now pending in the Second Judicial District for the State of Utah is properly removed to this court pursuant to [28 U.S.C. § 1442\(a\)](#).

Dated this 12th day of April, 2023.

TRINA A. HIGGINS  
United States Attorney

/s/ Amanda A. Berndt  
AMANDA A. BERNDT  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

The undersigned employee of the United States Attorney's Office hereby certifies that on April 12, 2023, the following document:

**Notice of Removal**

was served by U.S. Mail and electronic mail to the following individual:

Raland J. Brunson  
4287 South Harrison Boulevard, #132  
Ogden, Utah 84403  
[thedreamofthecentury@gmail.com](mailto:thedreamofthecentury@gmail.com)

/s/ Amanda A. Berndt  
AMANDA A. BERNDT  
Assistant United States Attorney