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Nov 16, 2015

Township of Wantage
thru Weiner Lesniak LLP Steven R. Tomabalakian, Esq for firm
Re: Docket No. SSX-C-21-15 Township of Wantage v. Thomas Caggiano
629 Parsipanny Road
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Parsipanny, New Jersey 07054-0438
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Court Clerk for Filing
43-47 High Street
Newton, NJ 07860
(973) 579-0675

Subject: Docket No. SSX-C-21-15 Township of Wantage v. Thomas Caggiano Notice

Township of Wantage

Plaintiff,

v.

Thomas Caggiano,

Defendant

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: SUSSEX COUNTY
GENERAL EQUITY PART**

DOCKET NO. SSX-C-21-15

Civil Action

**NOTICE
Disqualify Judge S. C. Hansbury, P.J.Ch
Transfer to Law Division Counter Claim
Notice - Transfer to U.S. District**

1. **Notice of Motions** to Transfer from Vicinage 10 State of New Jersey Superior Court Chancery Division to Division of Law for filing cross complaint for \$10 Million and

requesting punitive damages, motion to disqualify of Judge S. Hansbury, P.J.Ch and subsequent transfer of case to U.S. District Court as federal question and per rule of diversity and adding counter claims against the State of New Jersey, municipalities, law firms and other parties Tort Act violations of Breach of duty, Outrage and Causing emotional distress and other matters including assault, and false imprisonment with bodily harm and violation of civil rights under color and in continuing conspiracy by public officials in issuing false declarations to deprive me of my civil rights by fraud with retaliation against witnesses

TAKE JUDICIAL NOTICE of POINT OF LAW and MATTER OF FACT

2. Motions shall be provided the New Jersey Superior court and thereafter the U.S. District Court per following justifications:

a. 28 U.S. Code § 1332 - Diversity of citizenship; amount in controversy; costs, **(a)(1)**The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States

b 28 U.S. Code § 1391(b)(1) - Venue generally -A civil action may be brought in a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located

c. 28 U.S. Code § 1391(g) - MULTIPARTY, MULTIFORUM LITIGATION —
A civil action in which jurisdiction of the district court is based upon section 1369 of this title may be brought in any district in which any defendant resides or in which a substantial part of the accident giving rise to the action took place.

d. 28 U.S.C. § 1441(a), authorizes a defendant to remove from state court to federal court any civil action brought in a State court of which the district courts of the United States have original jurisdiction

e. Per Federal Courts Jurisdiction and Venue Clarification Act of 2011, H.R. 394, P.L. 112-63; the Act also adds a new code section 1446(c)(1), which adds to the current one-year limitation on removal a limited exception, authorizing a district court to permit removal after the one-year period if it finds that the plaintiff acted in bad faith to prevent removal

2. **NOTICE of REMOVAL** was provided the State of New Jersey and the Plaintiff in **ANSWER** by mailed received and filed Oct 13, 2015 and is also published on <http://thomascaggiano.com/COURT/> with background and relevant facts

Thomas Caggiano