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Dec 1, 2015

U.S. District Court for District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07101
973-645-3730

CF: 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
P.O. Box 438
Parsipanny, New Jersey 07054-0438
Office (973) 403-1100 Fax: (973) 403-0010

CF: Sussex County Judicial Center
Court Clerk for Filing
43-47 High Street
Newton, NJ 07860 (973) 579-0675

Subject: NOTICE of REMOVAL to U.S. District Court for Federal Question and Diversity
Counter Claim Docket No. SSX-C-21-15 Township of Wantage v. Thomas Caggiano

Township of Wantage	U.S. District Court
Plaintiff,	District of New Jersey
v.	DOCKET NO. 215-C-
Thomas Caggiano,	Civil Action
Defendant	NOTICE of REMOVAL

TAKE JUDICIAL NOTICE of POINT OF LAW and MATTER OF FACT

JUSTIFICATION:

Notice of Removal Motion to Transfer from Vicinage 10 State of New Jersey Superior Court, Sussex County, Chancery Division General Equity to U.S. District Court District of New Jersey Docket SSX-C-21-15 Township of Wantage (Sussex) v. Thomas Caggiano

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. 28 U.S.C. § 1331 - Original jurisdiction - U.S. Constitution Rights

f. 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 also provided with extensive letter brief adopted by reference, published on <http://thomascaggiano.com/COURT> and enclosed as Exhibit on attached CD. .

Thomas Caggiano

Dec 1, 2015