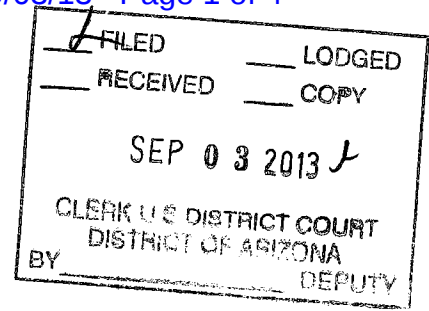


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561.909.2112 Fax
sns@shealylaw.us
Pro Se Defendant



**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Imran Ahmad Jamali, an individual,

Plaintiff,

v.

Maricopa County, a private municipal
corporation, et al.

Defendants.

Case No. CV-13-613-PHX-DGC

**DEFENDANT STAFFORD SHEALY'S
MOTION TO DISMISS**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, defendant Stafford Shealy (“SHEALY”), moves this Court for an Order dismissing SHEALY from the complaint filed on August 2, 2013 (Docket #89) by Imran Ahmad Jamali (hereinafter “JAMILI”) on the basis that this Court lacks personal jurisdiction over SHEALY. SHEALY has included the Declaration of STAFFORD SHEALY which is attached as EXHIBIT “1.” SHEALY requests of this Honorable Court, that equity and fairness prevail against the baseless and inaccurate accusations of Plaintiff. This motion seeks dismissal with prejudice for SHEALY.

RESPECTFULLY SUBMITTED this August 30, 2013.

By: s/ Stafford Shealy
Stafford Shealy
Pro Se Defendant

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2013, I electronically transmitted the attached document to the Clerk's Office via email and to the following registered CM/ECF recipients:

David Geoffrey Bray: dbray@dickinsonwright.com; karendt@dickinsonwright.com

David Nunzio Ferrucci: dferrucci@dickinsonwright.com, cwheeler@dickinsonwright.com

Joseph I Vigil: vigilj@mcao.maricopa.gov, gulley@mcao.maricopa.gov,
paduae@mcao.maricopa.gov

Robert Allen Miller: robmiller@aol.com, jennifer_frank@aol.com

Timothy J Thomason: TThomason@dickinsonwright.com,
ADeLosAngeles@dickinsonwright.com, MWestall@dickinsonwright.com

Victoria Lea Orze: vorze@dickinsonwright.com, jwaxler@dickinsonwright.com and

In addition, a copy of the attached documents was mailed via U.S.P.S. mail, first class, postage prepaid, to:

Clerk of Court
Sandra Day O'Connor
U.S. Courthouse
401 W. Washington Street
Phoenix, AZ 85003

Imran Ahmad Jamali
P.O. Box 6003
Chandler, Arizona 85224
Plaintiff Pro Se

By: s/ Stafford Shealy
Stafford Shealy
Pro Se Defendant

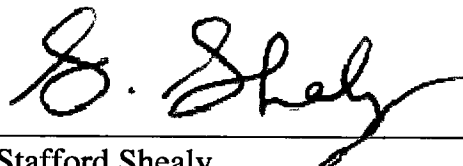
EXHIBIT “1”

DECLARATION OF STAFFORD SHEALY

I, Stafford Shealy, have personal knowledge of the facts stated in this declaration and certify that the below statements are true:

1. I am over the age of 18 and live in the State of Florida.
2. I have resided in Palm Beach County, Florida since 2002.
3. I have never been a resident of or traveled to the State of Arizona.
4. To the best of my knowledge, information and belief, I have never transacted any business within the State of Arizona.
5. I do not own or lease any real property in Arizona, nor have I any family in Arizona.
6. To the best of my knowledge, information and belief, I have never solicited business in Arizona, advertised in Arizona, or employed any persons or agents in Arizona.
7. I am not the owner of the MugRemove.com domain name, but have knowledge and belief that the domain is owned by Reputation Turn, LLC, a Florida limited liability company.
8. Neither I, nor Reputation Turn, LLC (and by extension MugRemove.com), have ever posted arrest information or arrest photographs on the internet.
9. I have no personal knowledge of Imran Ahmad Jamali and, to my knowledge and belief, have never communicated with Mr. Jamali.
10. I declare under penalty of perjury that the foregoing is true and correct.

Executed within the State of Florida this 30th day of August, 2013.



Stafford Shealy
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