

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 11-CV-22657-COOKE/TURNOFF

R.K./FL MANAGEMENT, INC., *et al.*,

Plaintiffs,

v.

JOHN DOE,

Defendant.

**PLAINTIFFS' REQUEST FOR ATTORNEYS' FEES AND COSTS IN
CONNECTION WITH MOTION TO REMAND AND INCORPORATED
MEMORANDUM OF LAW PURSUANT TO 28 U.S.C. § 1447(C)**

Plaintiffs, R.K./FL MANAGEMENT, INC., R.K. ASSOCIATES VII, INC., 17070 COLLINS AVENUE SHOPPING CENTER, LTD., RAANAN KATZ and DANIEL KATZ (collectively, the "Plaintiffs"), in connection with the pending Motion to Remand and Incorporated Memorandum of Law [D.E. 10], and pursuant to 28 U.S.C. § 1447(c), hereby request an award of "just costs and any actual expenses, including attorney fees, incurred as a result of the removal" in the event the Motion to Remand is granted.

Respectfully submitted,

By: s/Alan J. Kluger

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 30, 2011, I electronically filed the foregoing document with the Clerk of Court through the CM/ECF System. **I FURTHER CERTIFY** that a true and correct copy of the foregoing has been furnished via U.S. Mail this 30th day of August, 2011 to: **Robert C. Kain, Jr.**, Kain & Associates, Attorneys at Law, P.A., 900 Southeast Third Avenue, Suite 205, Ft. Lauderdale, Florida 33316.

By: s/Alan J. Kluger
Alan J. Kluger