

IN THE UNITED STATES DISTRICT COURT
SOUTHEN DISTRICT OF GEORGIA
SAVANNAH DIVISION

LISA T. JACKSON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: _____
)	
PAULA DEEN; PAULA DEEN)	
ENTERPRISES, LLC; THE LADY &)	
SONS, LLC; THE LADY)	
ENTERPRISES, INC.; EARL W.)	
“BUBBA” HIERS; and UNCLE)	
BUBBA’S SEAFOOD AND OYSTER)	
HOUSE, INC.,)	
)	
Defendants.)	

NOTICE OF REMOVAL OF CIVIL ACTION

COME NOW Paula Deen, Paula Deen Enterprises, LLC, The Lady & Sons. LLC, and The Lady Enterprises, Inc., four of the Defendants in the above styled case, and file this Notice of Removal pursuant to 28 U.S.C. §§ 1441 and 1446, and respectfully show the Court the following:

1. The case of Jackson v. Paula Deen, et. al., was filed and is presently pending in the Superior Court of Chatham County, Georgia, the same being Civil Action Number SPCV1200396.

2. Plaintiffs contend that defendants violated certain rights provided by the United States Constitution and the United States Code. Plaintiffs’ federal claims are brought, at least in part, pursuant to 42 U.S.C. § 1981 and Title VII of the Civil Rights Act of 1964.

3. This Court has jurisdiction in this matter on the basis of federal question jurisdiction pursuant to 28 U.S.C. §§ 1331 and §1441(b).

4. Additionally, there is supplemental jurisdiction regarding the other claims in this action pursuant to 28 U.S.C. § 1367.

5. This Notice of Removal has been timely filed within thirty days of initial receipt of Plaintiff's Amended Complaint, raising federal claims, and is therefore timely pursuant to 28 U.S.C. § 1446 (b).

6. Venue properly rests in the Savannah Division of the United States District Court for the Southern District of Georgia, as this case is being removed from the Superior Court of Chatham County, Georgia.

7. True and correct copies of all process, pleadings and orders served in this action are attached hereto as Exhibit "A", as required by 28 U.S.C. §1446(a).

8. All Defendants consent to the removal of this action to the United States District Court for the Southern District of Georgia, Savannah Division. See Notice of Consent, filed simultaneously herewith.

This 17th day of May, 2012.

OLIVER MANER LLP

/s/ I. Gregory Hodges

I. GREGORY HODGES
Georgia Bar No. 358925
WILLIAM P. FRANKLIN
Georgia Bar No. 274000
WILLIAM J. HUNTER
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Attorneys for Defendants Paula Deen, Paula Deen Enterprises, LLC, The Lady & Sons, LLC, and The Lady Enterprises, Inc.

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BUBBA'S SEAFOOD AND OYSTER)
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CIVIL ACTION NO.: SPCV1200396

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing has been served upon all counsel of record by sending the same via electronic mail and United States Mail, proper postage affixed thereto, addressed to the following:

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This 17th day of May, 2012.

[Signatures Continued on Following Page]

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/s/ F. Gregory Hodges _____

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