

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NARDYNE JEFFERIES, :  
Personal Representative on Behalf :  
Of BRISHELLTASHE JONES' Estate :  
51 Danbury Street, SW, Washington, DC 20032 :

Plaintiffs, :

v. :

The District Of Columbia Municipality :  
AND VINCENT GRAY, MAYOR :  
In His Official and Individual Capacity :  
1350 Pennsylvania Avenue, NW, Suite 221, :  
Washington, DC 20004 :

Serve: DISTRICT OF COLUMBIA, :  
OFFICE OF THE ATTORNEY GENERAL :  
(DARLENE FIELDS) 441 Fourth Street, :  
NW, 6<sup>TH</sup> Floor, Washington, DC 20001 :

Serve: HON. VINCENT GRAY, Mayor :  
DISTRICT OF COLUMBIA :  
(Official and Personal Capacity) :  
1350 Pennsylvania Avenue, NW, Suite 221 :  
Washington DC 20004 :

Serve: DEPARTMENT OF YOUTH :  
REHABILITATION SERVICES :  
(NEIL STANLEY, DIRECTOR :  
In his Individual and Official Capacity) :  
1000 Mount Olivet Road :  
Washington, DC 20002-2210 :

Serve: DC METROPOLITAN POLICE :  
DEPARTMENT :  
(CHIEF CATHY LANIER, In Her :  
Official and Individual Capacity) :  
Headquarters 300 Indiana Avenue, :  
NW Washington, DC 20001 :

Serve: OFFICE OF ASSISTANT U.S. ATTORNEY :  
(D.C. U.S. ATTORNEY RONALD C. MACHEN, JR.:  
In His Official and Individual Capacity) :  
555 Fourth Street, NW Washington, DC 20530 :

Serve: D.C. OFFICE OF ATTORNEY GENERAL :  
(ACTING ATTORNEY GENERAL :  
IRVIN B. NATHAN In His Official Capacity) :  
(PETER NICKLES, FORMER ATTORNEY :  
GENERAL In His Individual Capacity :  
441 Fourth Street, NW, 6th Floor, :  
Washington, DC 20001 :

Serve: DEPARTMENT OF HUMAN SERVICES, :  
YOUTH SERVICES ADMINISTRATION, :  
DIVISION OF COURT AND COMMUNITY :  
PROGRAMS :  
(DIRECTOR CLARENCE H. CARTER :  
In His Official Capacity) :  
170 L'Enfant Promenade, S.W. :  
Washington, DC 20447 :

Serve: COURT SERVICES AND OFFENDER :  
SUPERVISION AGENCY FOR :  
THE DISTRICT OF COLUMBIA :  
(DEPUTY DIRECTOR ADRIENNE POTEAT :  
In Her Official Capacity) :  
300 Indiana Avenue, NW Washington, DC 20001 :

Serve: D.C. PRETRIAL SERVICES AGENCY :  
(DIRECTOR SUSAN W. SHAFFER :  
In Her Official Capacity) :  
633 Indiana Avenue, NW, Suite 1120 :  
Washington, D.C. 20004 :

Serve: D.C. DEPARTMENT OF MENTAL HEALTH :  
(DIRECTOR STEPHEN T. BARON :  
In His Official Capacity) 64 New York Avenue, :  
NE, 4th Floor Washington, DC 20002 :

Serve: DC CRIMINAL JUSTICE :  
COORDINATING COUNCIL :  
(MANNONE A. BUTLER, :  
INTERIM EXECUTIVE DIRECTOR :  
In Her Official Capacity) :  
441 Fourth Street NW, Suite 727 N, :  
Washington, DC 20001. :

Serve: D.C. HOUSING AUTHORITY :  
(ADRIENNE TODMAN, DIRECTOR :  
In Her Official Capacity) :  
1133 North Capitol Street N.E. :  
Washington, DC 20002 :

Serve: D.C. PUBLIC SCHOOLS :  
(KAYA HENDERSON, CHANCELLOR :  
(In Her Official Capacity) :  
825 N Capitol Street, NE :  
Washington, DC 20004 :

Serve: JUSTICE GRANTS ADMINISTRATON :  
(LISA E. BROOKS, DIRECTOR) :  
(In Her Official Capacity) :  
1350 Pennsylvania Avenue, NW, :  
Suite 317 Washington, DC 20004 :

Serve: PEACEHOLICS :  
(JAUHAR ABRAHAM, C.E.O. :  
In His Official Capacity) :  
611 Raleigh Place, SE :  
Washington D.C., DC 20032-4205 :

Serve: PEACE ABODE :  
(RONALD L. MOTEN, C.O.O. :  
In His Official Capacity) :  
3119 Martin Luther King Avenue, :  
SE Washington, DC 20032 :

Serve: D.C. FIRE AND EMERGENCY :  
MEDICAL SERVICES :  
(CHIEF KENNETH B. ELLERBE :  
In His Official Capacity) 1923 Vermont :  
Avenue, NW Washington, DC 20001 :

Serve: NATIONAL COMPANY ROMARM :  
(GENERAL MANAGER, VASILE MARIUS :  
CruSAN) :  
5B, Timisoara Str. Bucharest, Romania 061301 :

And :

JANE DOE a/k/a/ "GODMOTHER" :  
(Unknown defendant) 626 Brandywine :  
Street, SE Washington, DC 20032 :

JOHN DOE (Unknown defendants) :  
ADDRESS UNKNOWN City, State and Zip :  
Code: :

Defendants. :  
: :  
: :  
: :

NOTICE OF REMOVAL OF ACTION

Defendant District of Columbia, by and through counsel Steven J. Anderson, and pursuant to 28 U.S.C. 1441(b) and 1446 notifies the Court of the removal of the above-captioned action filed in the Superior Court of the District of Columbia, Civil Action No. 2011 CA 0002446 on March 30, 2011. Plaintiffs' complaint alleges violation of Title 42 U.S.C. § 1983 and various other civil rights violations under federal law. (See attached complaint.).

The grounds for removal is that the Complaint asserts, *inter alia*, causes of action "founded on a claim or right arising under the Constitution, treaties or laws of the United States" which are removable without regard to the citizenship or residence of the parties. See 28 U.S.C. § 1441(b). The complaint as whole implicates a number of federal agencies and alleges violations of federal law in the District of Columbia.

WHEREFORE, this action now pending in the Superior Court of the District of Columbia is properly removed to this court pursuant to 28 U.S.C. §1441(b) and 1446 and the Superior Court of the District of Columbia "shall proceed no further unless and until the case is remanded." See 28 U.S.C. §1446(d).

Respectfully Submitted

IRVIN B. NATHAN  
Acting Attorney General for the District of Columbia

GEORGE VALENTINE  
Deputy Attorney General Litigation Division

*s/ William B. Jaffe*  
WILLIAM B. JAFFE [502399]  
Chief, General Litigation Section III

/s/ Steven J. Anderson

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STEVEN J. ANDERSON [334480]  
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Email: [Steve.anderson@dc.gov](mailto:Steve.anderson@dc.gov).

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Removal of Action was mailed, postage prepaid, to the plaintiff on this 23 day of June 2011, to;

John F. Mercer, Esq.,  
Mercer Law Associates, PLLC  
Counsel for Plaintiffs  
1629 K Street, N.W.  
Suite 300  
Washington, DC 20036

/s/ Steven J. Anderson

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Steven J. Anderson  
Assistant Attorney General