

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CITY OF MINNEAPOLIS

Plaintiff,

NOTICE OF REMOVAL

vs.

CIVIL ACTION NO. _____

REDFLEX TRAFFIC SYSTEMS, INC.,

Defendant.

To the Clerk of Court of the United States District Court for the District of Minnesota:

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1446 and 28 U.S.C. § 1332(a)(1), defendant Redflex Traffic Systems, Inc. (“Redflex”) removes the matter of *City of Minneapolis vs. Redflex Traffic Systems, Inc.*, Hennepin County District Court, File No. 27-CV-10-17747 (Honorable Tanya M. Bransford), filed on July 14, 2010, to the United States District Court for the District of Minnesota on the ground that the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States. Attached hereto as Exhibit A is a copy of the Complaint served on Redflex on July 14, 2010, and filed in the state court proceeding. Attached hereto as Exhibit B is a copy of the Notice of Judicial Assignment in the state court proceeding. To defendant’s knowledge, these are the only pleadings and orders in the state court proceeding to date.

The City of Minneapolis is a municipal corporation and political subdivision of the state of Minnesota and is thus a citizen of the state of Minnesota. At the time of service

Redflex was, and still is, a corporation and a citizen of two states. Redflex was, and still is, a citizen of the state of Delaware because it is incorporated in Delaware. Redflex was, and still is, a citizen of the state of Arizona because it has its principal place of business in Arizona. In the state court proceeding, the City of Minneapolis has sued Redflex to recover in excess of \$75,000, exclusive of interest and costs. (Ex. A.) Because there is complete diversity between the parties and the matter in controversy exceeds \$75,000, exclusive of interest and costs, under 28 U.S.C.A. § 1332(a)(1), this Court has original jurisdiction of this matter, and removal is proper.

Dated: August 3, 2010

LAW OFFICE OF DAVID L. SHULMAN

A handwritten signature in black ink, appearing to read 'D. Shulman', written over a horizontal line.

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