

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

LEONARD HARP. \*

NJAKI WILSON, \*

STEPHEN CECI, \*

LAKEYSHA PENNIX, \*

LYDA LANGFORD, \*

ROGER EVANS, \*

*Plaintiffs,* \*

Civil Action No.: \_\_\_\_\_

v. \*

GOVERNOR LAWRENCE J. \*

HOGAN, \*

TIFFANY P. ROBINSON, \*

*Defendants.*

\* \* \* \* \*

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1441 and 1446 and Federal Rule of Civil Procedure 81, defendants Governor Lawrence J. Hogan and Tiffany P. Robinson, by undersigned counsel, give notice of the removal of this action from the Circuit Court for Baltimore City, Maryland, to the United States District Court for the District of Maryland. The grounds for removal are as follows:

1. Plaintiffs, Leonard Harp, Njaki Wilson, Stephen Ceci, Lakeysha Pennix, Lyda Langford and Roger Evans commenced this putative class action against defendants

on June 24, 2021 by filing a complaint in the Circuit Court for Baltimore City, Maryland. *See* Exhibit 1. The complaint was docketed as Case No. 24-C-21-002910. As part of the complaint, plaintiffs included a “Motion for Temporary Restraining Order.” *Id.*

2. As of the date of this filing, plaintiffs have not effected service on defendants.

3. In accordance with 28 U.S.C. § 1446(b), defendants timely filed this notice of removal on June 30, 2021, within 30 days after defendants were first notified of the complaint in the State court action.

4. In accordance with 28 U.S.C. § 1446(a) and Local Rule 103.5.a, defendants are filing contemporaneously with this notice true and legible copies of all process, pleadings, documents and orders they have received in connection with this matter. Defendants will file within 30 days true and legible copies of all other documents then on file in the State court together with the certification required by Local Rule 103.5.a.

5. This Court has jurisdiction over this case under 28 U.S.C. §§ 1331 and 1441 because it involves claims or rights arising under the laws of the United States. In their complaint seeking declaratory judgment and injunctive relief, plaintiffs allege that defendants have violated their rights under the federal Coronavirus, Aid, Relief and Economic Security Act (“CARES”), 15 U.S.C. §§ 9021, 9025. Exhibit 1.

6. This Court has supplemental jurisdiction under 28 U.S.C. § 1367(a) over the remaining claims in the complaint. These claims allege that defendants have violated Maryland law governing unemployment insurance claims. Further, all of plaintiffs’ claims for relief incorporate the same factual allegations.

7. Defendants will promptly file a copy of this notice of removal with the Clerk of the Circuit Court for Baltimore City as required by 28 U.S.C. § 1446(d).

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

/s/ Robert A. Scott  
ROBERT A. SCOTT (Fed. Bar No. 24613)  
Assistant Attorney General  
Maryland Office of the Attorney General  
200 Saint Paul Place, 20th Floor  
Baltimore, Maryland 21202  
rscott@oag.state.md.us  
(410) 576-7055  
(410) 576-6955 (facsimile)

June 30, 2021

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2021, the foregoing notice of removal was filed with the Clerk of the Court for the United States District Court for the District of Maryland using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. I hereby further certify that a copy of the foregoing notice of removal was sent via first-class mail, postage prepaid, to:

Alec Summerfield, Esquire  
2011 North Charles Street  
Baltimore, Maryland 21218

Attorney for Plaintiffs

/s/ Robert A. Scott