

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JENNIE SAYLOR,)	Case No.
)	
Plaintiff,)	Judge
)	
vs.)	
)	
DEBT MANAGEMENT GROUP LLC, <i>et al.</i> ,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Pursuant to 28 U.C.S. §1446 *et seq.*, Defendants Debt Management Group LLC, The Davis Law Group PC, Brian J. Davis, Moore Legal Center PC, and Thomas A. Moore (collectively, “Defendants”), by and through their undersigned counsel, hereby give notice of removal of this action from the Erie County Court of Common Pleas, and as grounds therefor, state as follows:

1. Defendant Debt Management Group LLC (“DMG”) is a New York limited liability company with its principal place of business in New York, New York, and is a defendant in a civil action filed in, and presently pending before, the Erie County Court of Common Pleas, styled *Saylor v. Debt Management Group LLC, et al.*, Case No. 2015 CV 0551 (the “State Court Action”).

2. Defendant The Davis Law Group PC (“Davis Law”) is a law firm with its principal place of business in Staten Island, New York, and is a defendant in the State Court Action.

3. Defendant Brian J. Davis (“Davis”) is an individual residing in the state of New York, and is a defendant in the State Court Action.

4. Defendant Moore Legal Center PC (“Moore Legal”) is a law firm with its principal place of business in Encinitas, California, and is a defendant in the State Court Action.

5. Defendant Thomas A. Moore (“Moore”) is an individual residing in the state of California, and is a defendant in the State Court Action.

6. On September 3, 2015, the State Court Action was commenced by Plaintiff’s filing of a Complaint against the Defendants.

7. Plaintiff’s Complaint was delivered to Defendant Davis Law on October 9, 2015 by certified U.S. mail, and is the initial pleading setting forth the claims for relief upon which the State Court Action is based.

8. Pursuant to 28 U.S.C. § 1446(a), a copy of the Summons and Complaint, which constitute all process, pleadings, and orders served on Davis in the State Court Action are attached collectively as Exhibit A.

9. As required by 28 U.S.C. § 1446(b), this Notice of Removal has been filed within thirty (30) days after Davis Law’s and Davis’ receipt of Plaintiff’s Complaint and removal has not been waived.

10. Plaintiff is, and was at the time the State Court Action was commenced, a citizen of the State of Ohio.

11. Defendants DMG and Davis Law are, and were at the time the State Court Action was commenced, entities organized under New York law and having a principal place of business in the state of New York.

12. Defendant Davis is, and was at the time the State Court Action was commenced, a resident of the state of New York.

13. Defendant Moore Legal is, and was at the time the State Court Action was commenced, an entity organized under California law and having a principal place of business in the state of California.

14. Defendant Moore is, and was at the time the State Court Action was commenced, a resident of the state of California.

15. Accordingly, complete diversity of citizenship exists between the parties.

16. All of the Defendants consent to removal of the State Court Action.

17. Plaintiff's Complaint is based upon the allegation that the Defendants violated the Federal Credit Reporting Act, 15 U.S.C. § 1681a, *et seq.*

18. Based upon the foregoing, this Court has original federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331.

8. With the State Court Action pending in Erie County, Ohio, the Notice of Removal is to be filed in this court pursuant to 28 U.S.C. § 1446(a).

9. A copy of this Notice of Removal is being filed with the Clerk of the Erie County Court of Common Pleas, and is being served upon counsel for Plaintiff, as required by 28 U.S. C. § 1446(d).

WHEREFORE, the Defendants respectfully request that this case proceed before this Court as an action properly removed.

Respectfully submitted,

/s/ Rachel L. Steinlage

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Attorney for Defendants Debt Management Group LLC, The Davis Law Group PC, Brian J. Davis, The Moore Legal Center PC, and Thomas A. Moore

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 6, 2015, a true and accurate copy of the foregoing *Notice of Removal* was filed electronically through the Court's ECF system, and that on that same day a copy of the foregoing Notice was sent by regular U.S. mail to counsel for Plaintiff: Katherine L. Wolfe, Luftman Heck & Assoc. LLP, 580 East Rich Street, Columbus, Ohio 43215; and Brian M. Garvine, Law Offices of Brian M. Garvine, LLC, 5 East Long Street, Suite 1100, Columbus, Ohio 43215.

/s/ Rachel L. Steinlage

Rachel L. Steinlage (0079450)