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February 23, 1979

Of Counsel
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Anthony F. Dragonette, Esq.
Ruston & Nance
P. O. Box 2220
Tustin, Ca. 92680

Re: Antonio Romer v. Doe I, et al.

Dear Mr. Dragonette:

Enclosed, for your information, is the following:

- (1) A copy of the Change of Name indicating the correct name of Srolloff & Biren;
- (2) A copy of the Petition for Removal; as indicated the Federal Court case bears Civil Number 78-2591-LEW(Px).

Very truly yours,

MATTHEW B. F. BIREN

MBFB:am

cc: Gordon F. Sausser, Esq.
Uniroyal

UHL 14055

SROLOFF & BIREN
ATTORNEYS AT LAW
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LOS ANGELES, CALIFORNIA 90010
(213) 380.3140

Plaintiff.
Attorneys for _____

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ANTONIO ROMERO,)
)
Plaintiff,)
)
vs.)
)
DOE I, DOE II, DOE III,)
DOE IV, DOE V,)
)
Defendants.)

Case No. CV 78 2591 LEW (Px)
NOTICE OF CHANGE OF NAME OF
COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that the firm of SROLOFF, BIREN & HJELT
has changed its name to SROLOFF & BIREN. The address and
telephone number remain the same. All correspondence and
communications should be directed in accordance with the foregoing.

Dated: February 20, 1979

SROLOFF & BIREN

By _____
MATTHEW B. F. BIREN
Attorneys for Plaintiff.

UPL 14056

(PROOF OF SERVICE

I, the undersigned, certify and declare that I am a citizen of the United States, over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the within action. On February 20, 1979, I served a true copy of the attached

NOTICE OF CHANGE OF NAME OF COUNSEL

on the Defendant in said action by placing said copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail in the City of Los Angeles, County of Los Angeles, State of California, addressed as follows:

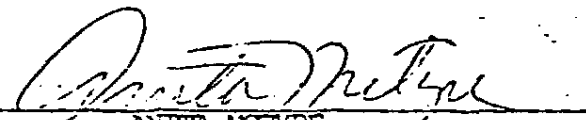
George W. Fulton, Jr., Esq.
Schell & Delamer
1200 Wilshire Blvd., Suite 500
Los Angeles, Ca. 90017

UPL 14057

and there is regular communication by mail between the place of mailing and the place so addressed.

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on February 20, 1979 at Los Angeles, California.


ANITA MCINTYRE

1 GEORGE W. FULTON, JR.
2 SCHELL & DELAMER
3 1200 Wilshire Boulevard, Suite 500
4 Los Angeles, California 90017
5 (213) 481-1140

6 Attorneys for Defendant, THE IMCO CONTAINER
7 COMPANY, a Division of The Ethyl Development
8 Corporation, a Delaware Corporation, sued
9 herein as DOE II

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 ANTONIO ROMERO,

13 Plaintiff,

14 v.

15 DOE I, DOE II, DOE III, DOE IV,
16 DOE V,

17 Defendants.

NO. CV 78-2591-LEW(PK)

PETITION FOR REMOVAL

URL 14058

18 TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE
19 CENTRAL DISTRICT OF CALIFORNIA:

20 The Petition of THE IMCO CONTAINER COMPANY, a Division
21 of The Ethyl Development Corporation, a Delaware Corporation,
22 sued herein as DOE II, respectfully shows:

23 1. On or about the 9th day of June, 1978, an action
24 was commenced against Petitioner in the Superior Court of the
25 State of California, in and for the County of Los Angeles,
26 entitled ANTONIO ROMERO v. DOE I, DOE II, DOE III, DOE IV, DOE V,
27 No. NCC 121 27B, by service upon Petitioner of a summons and
28 complaint on said date, copies of which are annexed hereto as

1 Exhibit "A" and Exhibit "B", respectively. The Dow Chemical
2 Corporation was sued herein as DOE I. However, they were dismissed
3 with prejudice on June 21, 1978. There are no other defendants
4 and no further proceedings have been had therein.

5 2. The above described action is a civil action of
6 which this Court has original jurisdiction under the provisions
7 of Title 28, United States Code, Section 1332 [Diversity of
8 Citizenship], and is one which may be removed to this Court by
9 the Petitioner, Defendant herein, pursuant to the provisions of
10 Title 28, United States Code, Section 1441, in that it is a civil
11 action wherein the matter in controversy exceeds the sum or value
12 of \$10,000 exclusive of interest and costs, and is between
13 citizens of different states.

14 The Plaintiff ANTONIO ROMERO at the time this action
15 was commenced, was and still is, a citizen of the State of
16 California; but the Defendant THE IMCO CONTAINER COMPANY, a
17 Division of The Ethyl Development Corporation, was at the time
18 this action was commenced, and still is, a Delaware Corporation,
19 with its principal place of business in Virginia, and was not
20 and is not a citizen of the State of California wherein this
21 action was brought.

22 3. Petitioner files herewith a bond with good and
23 sufficient surety conditioned, as provided by Title 28, United
24 States Code, Section 1446(d), that it will pay all costs and
25 disbursements incurred by reason of the removal proceedings
26 hereby brought should it be determined that this action is not
27 removable or is improperly removed.

28 / / /

URL 14059

1 WHEREFORE Petitioner prays that the above action now
2 pending against it in the Superior Court of the State of
3 California, in and for the County of Los Angeles, be removed
4 therefrom to this Court.

5 DATED: July 7, 1978.

6 SCHELL & DELAMER

7
8 By George W. Fulton, Jr.
9 GEORGE W. FULTON, JR.,
10 Attorneys for Defendant, THE
11 IMCO CONTAINER COMPANY, a
12 Division of The Ethyl Develop-
13 ment Corporation, a Delaware
14 Corporation, sued herein as
15 DOE II

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UPL 14060