

1 PAULA TRIPP VICTOR (Bar No. 113050)
ptv@amclaw.com
2 PETER B. RUSTIN (Bar No. 181734)
pbr@amclaw.com
3 ANDERSON, McPHARLIN & CONNERS LLP
707 Wilshire Blvd., Suite 4000
4 Los Angeles, California 90017-3623
TELEPHONE: (213) 688-0080 ♦ FACSIMILE: (213) 622-7594

5 Attorneys for Defendants,
6 RYAN WEISENBERG and
PEPPERDINE UNIVERSITY
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
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11 HALEY VIDECKIS and LAYANA
WHITE,

12 Plaintiffs,

13 vs.

14 RYAN WEISENBERG, an individual,
15 and PEPPERDINE UNIVERSITY, a
corporation doing business in
16 California,

17 Defendants.

Case No. 2:15-CV-00298

**NOTICE OF REMOVAL OF
ACTION UNDER 28 U.S.C. § 1441**

Trial Date: None

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19 **TO THE CLERK OF THIS COURT:**

20 PLEASE TAKE NOTICE that Defendants RYAN WEISENBERG and
21 PEPPERDINE UNIVERSITY (“Defendants”) hereby remove to the United States
22 District Court, Central District of California, the state court action styled “*Haley*
23 *Videckis, et al. v. Ryan Weisenberg, et al.*” bearing Case No. SC123498, which
24 action was filed in the Superior Court of the State of California in and for the
25 County of Los Angeles on December 10, 2014, and served on Defendants on
26 December 15, 2014.

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ANDERSON, MCPHARLIN & CONNERS LLP
LAWYERS
707 WILSHIRE BLVD., SUITE 4000
LOS ANGELES, CALIFORNIA 90017-3623
TEL (213) 688-0080 • FAX (213) 622-7594

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GROUNDS FOR REMOVAL

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1. This Court has original jurisdiction of this action under 28 U.S.C. § 1331, on the basis of federal question, in that it arises under Title IX, 20 U.S.C. § 1681(a). This action may be removed by the Defendants pursuant to 28 U.S.C. § 1441(a) in that it is a civil action brought in a state court of which the district courts of the United States have original jurisdiction.

2. On December 10, 2014, Plaintiffs HALEY VIDECKIS and LAYANA WHITE (“Plaintiffs”) commenced an action against Defendants in the Superior Court of the State of California in and for the County of Los Angeles, bearing Case No. SC123498.

3. A true and correct copy of the Complaint (the “Complaint”), and all other papers, process, pleadings and orders served upon Defendants, are attached as “**Exhibit A**” to the attached Declaration of Paula Tripp Victor (“Victor Decl.”).

4. The Complaint alleges causes of action against Defendants for Violation of Right of Privacy Under California Constitution, Article 1, § 1; Violation of California AB 537 including but not limited to California Educational Code § 220, 221, 66251, 66270; and Violation of Title IX.

5. The Plaintiffs served the Complaint upon Defendants on December 15, 2014. A true and correct copy of the Summons is attached to the Victor Decl. as “**Exhibit B**.”

6. This Notice of Removal is timely filed pursuant to 28 U.S.C. 1446(b) since it is filed within 30 days of service of the Summons and Complaint on the Defendants.

VENUE

7. 28 U.S.C. §1441(a) provides that, “any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or defendants, to the district court of the United States for the district and division embracing the place where such action was pending.”

1 8. The Plaintiffs filed this action in the Superior Court for the County of
2 Los Angeles. According to 28 U.S.C. §84(c)(2), this Court embraces the Superior
3 Court for the County of Los Angeles and therefore is the proper Court for the
4 removal of this action.

5 9. All Defendants who have been served with the Summons and
6 Complaint have joined in this Notice of Removal.

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8 DATED: January 14, 2015 ANDERSON, McPHARLIN & CONNERS LLP

9

/s/ Paula Tripp Victor /s/

By: _____

Paula Tripp Victor

Peter B. Rustin

Attorneys for Defendants, Ryan Weisenberg and
Pepperdine University

ANDERSON, McPHARLIN & CONNERS LLP

LAWYERS

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