

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
C/A No.: 26-AV-99999

Brian Sill,

Plaintiff,

v.

Town of Ninety Six and Jimmie Brown, in
her personal capacity,

Defendants.

NOTICE OF REMOVAL

NOW COME the Defendants Town of Ninety Six and Jimmie Brown (hereinafter “Defendants”), by and through its undersigned counsel, pursuant to Rule 81(c), Federal Rules of Civil Procedure, to remove the above-captioned case filed by Plaintiff Brian Sill (hereinafter “Plaintiff”), as follows:

In support of this Notice of Removal, the Defendants show as follows:

1. Plaintiff filed this action in the Court of Common Pleas of Richland County on or about March 31, 2026.
2. Defendants were served on or about April 8, 2026.
3. Plaintiff’s allegations purport to state a claim under 42 U.S.C. § 1983 for an alleged violation of the Fifth Amendment Procedural Due Process.
4. Such a claim presents a federal question under 28 U.S.C. § 1331, over which this Court exercises original jurisdiction. As such, the case may be removed under 28 U.S.C. § 1441.
5. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).
6. Exhibit A is a copy of “all process, pleadings, and orders served upon” the Defendant in this action, as required by 28 U.S.C. § 1446(a).

7. All parties who have been served in this matter consent to removal.

8. In accordance with 28 U.S.C. § 1446(d), Defendant is serving this Notice of Removal on counsel for Plaintiff, and also filing a copy of the Notice of Removal with the Clerk of Court for Greenwood County.

Dated this the 7th day of May, 2026.

Respectfully submitted,

RICHARDSON PLOWDEN & ROBINSON, P.A.

/s/Eugene H. Matthews
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WE CONSENT:

LAW OFFICES OF EDWARD S. MCCALLUM,
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