

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION

RONALD STAFFORD

PLAINTIFF

V.

**CIVIL ACTION NO. 5:15-cv-110 DCB-
MTP**

**MALLORIE HUDSON-KLINE ORY,
GOVERNMENT EMPLOYEES INSURANCE COMPANY,
GEICO INSURANCE AGENCY, INC.
LAMORAK INSURANCE COMPANY f/k/a
ONE BEACON AMERICA INSURANCE COMPANY,
ATLANTIC SPECIALTY INSURANCE COMPANY d/b/a
ONE BEACON AMERICA INSURANCE,
OBI NATIONAL INSURANCE COMPANY d/b/a
ONE BEACON AMERICA INSURANCE AND
UNKNOWN INSURANCE COMPANIES 1-5**

DEFENDANTS

NOTICE OF REMOVAL

Come now Lamorak Insurance Company f/k/a One Beacon America Insurance Company, Atlantic Specialty Insurance Company d/b/a One Beacon America Insurance, and OBI National Insurance Company d/b/a One Beacon America Insurance (hereinafter collectively "One Beacon" or "answering defendants"), by and through counsel, and file their Notice of Removal of this civil action from the Circuit Court of Pearl River County, Mississippi, to the United States District Court for the Southern District of Mississippi, Southern Division. In support of the same, the removing defendants would show unto the Court as follows:

1. Lamorak Insurance Company f/k/a One Beacon America Insurance Company, Atlantic Specialty Insurance Company d/b/a One Beacon America Insurance, and OBI National Insurance Company d/b/a One Beacon America Insurance are defendants in a lawsuit filed on September 10, 2015 styled *Ronald Stafford*

v. Mallorie Hudson-Kline Ory, Government Employees Insurance Company, GEICO Insurance Agency, Inc., Lamorak Insurance Company f/k/a One Beacon America Insurance Company, Atlantic Specialty Insurance Company d/b/a OneBeacon America Insurance, OBI National Insurance Company d/b/a OneBeacon America Insurance and Unknown Insurance Companies 1-5. The same is now pending in the Circuit Court of Pearl River County, Mississippi, being cause number 2015-0146M. A copy of the Complaint in this cause is attached hereto as Exhibit A and incorporated herein by reference.

2. Plaintiff Ronald Stafford is a resident of Pearl River County, Mississippi.

3. Lamorak Insurance Company f/k/a One Beacon America Insurance Company is a Pennsylvania Company, incorporated by the State of Pennsylvania and having its principal place of business at 1880 JFK Boulevard, Suite 801, Philadelphia, Pennsylvania 19103.

4. Atlantic Specialty Insurance Company is a New York corporation, incorporated by the State of New York, and having its principal place of business at 77 Water Street, New York, New York 10005.

5. OBI National Insurance Company is a Pennsylvania corporation, incorporated by the State of Pennsylvania, and having its principal place of business at 116 Pines Street, Suite 320, Harrisburg, Pennsylvania.

6. Mallorie Hudson-Kline Ory is a citizen of the State of Texas, and was a citizen of the State of Texas at the time Plaintiff's Complaint was filed.

7. Government Employees Insurance Company is a Maryland corporation, incorporated by the State of Maryland, and having its principal place of business at 5260 Western Ave., Chevy Chase, MD 20815-3799.

8. GEICO Insurance Agency, Inc. is a Maryland corporation, incorporated by the State of Maryland, and having its principal place of business at 5260 Western Ave., Chevy Chase, MD 20815-3799.

9. The parties in this matter are completely diverse.

10. In his Complaint, the Plaintiff's damages demand as to Lamorak Insurance Company, and either Atlantic Specialty Insurance Company or OBI National Insurance Company, is in an amount "up to the applicable coverage limit." Removing defendants would show that the applicable insurance policy has a coverage limit in excess of \$75,000. As such, Plaintiff's alleged damages demand exceeds \$75,000.00, exclusive of interest and costs, as required by 28 U.S.C. § 1332(a).

11. Defendants hereby remove this case pursuant to 28 U.S.C. § 1332(a)(1) as this court has original jurisdiction over controversies between parties with complete diversity of citizenship, where the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

12. The United States District Court for the Southern District of Mississippi, Southern Division has jurisdiction over this matter and is the proper venue for this action as it embraces the place where said action is currently pending.

WHEREFORE PREMISES CONSIDERED, Lamorak Insurance Company f/k/a One Beacon America Insurance Company, Atlantic Specialty Insurance Company

d/b/a One Beacon America Insurance, and OBI National Insurance Company d/b/a One Beacon America Insurance pray that this Court accept this Notice of Removal and further pray for any other appropriate relief that this Court warrants.

RESPECTFULLY SUBMITTED this the 12 day of November, 2015.

LAMORAK INSURANCE COMPANY f/k/a
ONE BEACON AMERICA INSURANCE
COMPANY, ATLANTIC SPECIALTY
INSURANCE COMPANY d/b/a ONE
BEACON AMERICA INSURANCE AND
OBI NATIONAL INSURANCE COMPANY
d/b/a ONEBEACON AMERICA
INSURANCE

BY: 

One of Their Attorneys

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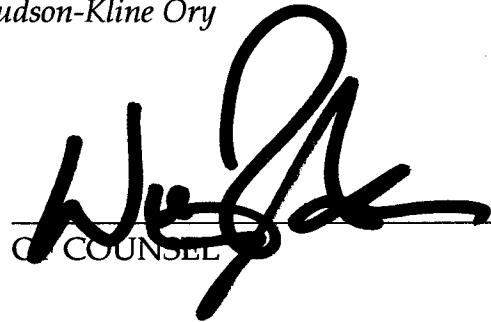
CERTIFICATE

I, the undersigned, of Allen, Allen, Breeland & Allen, PLLC, attorneys of record for defendants, hereby certify that I have this day mailed, postage prepaid, a true and correct copy of the above and foregoing Notice of Removal to:

Collin Maley, Esq.
MALEY & WALKER, PLLC
P.O. Box 12827
Jackson, Mississippi 39236
Attorney for Plaintiff

Robert W. Atkinson, Esq.
Atkinson Law Firm
P.O. Box 6462
Gulfport, MS 39506-6462
Attorney for Defendant, Mallorie Hudson-Kline Ory

This the 12 day of November, 2015.


C. COUNSEL