

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

COL. JUNEL JEFFREY,

Plaintiff,

v.

DR. CHARLES M. SPEARS,

Defendant.

Case No.:

**DEFENDANT DR. CHARLES M SPEARS NOTICE OF REMOVAL TO THE UNITED
STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

PLEASE TAKE NOTICE:

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Dr. Charles M. Spears (“Defendant”) hereby gives notice and removes this civil action from the District of Columbia Superior Court.

Respondent’s counsel signs this Notice of Removal pursuant to Rule 11 of the Federal Rules of Civil Procedure and Respondent pleads the following in accordance with the parallel requirements of 28 U.S.C. § 1446(a) for a “short and plain statement of the grounds for removal”

1. Plaintiff is a resident of the District of Columbia. *See* Exhibit 2 at ¶ 3 (Complaint).
2. Defendant is a resident of Lansing, Kansas. *See id.* at ¶ 4; *see also* Declaration of Dr. Charles M. Spears at ¶ 3 (Oct. 10, 2026).
3. Thus, Complete diversity exhibits between Plaintiff and Defendant in this action pursuant to 28 U.S.C. § 1332.

4. Additionally, the amount in controversy in this action exceeds \$75,000. *See* Ex. 2 at Prayer (seeking \$18 million under Count I, \$10 million under Count II, and \$25 million in punitive damages).

5. Accordingly, this Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) and this action is properly removable pursuant to 28 U.S.C. § 1441(a)-(b).

6. This action was filed on September 10, 2026. Thirty calendar days from September 10, 2026 is October 10, 2026. Defendant became aware of this action on September 22, 2026; 30 days from September 22, 2026 is October 22, 2026. This Notice of Removal is easily timely pursuant to 28 U.S.C. § 1446(b)(1) because it is “filed within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based.” No consents are needed to remove.

7. The Docket and Pleadings in the District of Columbia Superior Court are attached hereto as Exhibits 1, 2, 3, 4, and 5.

8. We are also filing, per 28 U.S.C. § 1446(d) a copy of this Notice of Removal with the District of Columbia Superior Court.

Dated: October 10, 2026

Respectfully submitted,

/s/ Samuel Everett Dewey
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