

3. Based on the allegations of the Complaint and for the reasons discussed below, Defendants timely remove this action to this Court pursuant to 28 U.S.C. §§ 1332(a), 1441, and 1446.

BASIS FOR FEDERAL JURISDICTION

4. Pursuant to 28 U.S.C. § 1441(a), “[e]xcept as otherwise expressly provided by Act of Congress, 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 the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

5. As set forth below, this Court has original jurisdiction over this action based on diversity of citizenship.

Diversity Jurisdiction

6. This Court has original jurisdiction over this civil action under 28 U.S.C. § 1332(a) because the amount in controversy exceeds the sum or value of \$75,000 and the matter is between citizens of different states.

7. Plaintiff prays for damages in the amount of \$100,000. Compl., Second Cause of Action, at 3. The amount in controversy for purposes of removal based on diversity of citizenship therefore exceeds \$75,000. *See* 28 U.S.C. § 1446(c)(2).

8. Defendant Google Inc. is a Delaware corporation with its principal place of business in Mountain View, California. It is therefore a citizen of Delaware and California. 28 U.S.C. § 1332(c)(2). Defendants Google Data Inc. and Google Information Inc. are California corporations with their principal places of business in Mountain View, California. They are therefore citizens of California. *Id.*

9. Plaintiff alleges that it is a domestic limited liability company with its principal place of business in Nassau County, New York. Compl. ¶ 1. Plaintiff is therefore a citizen of New York. 28 U.S.C. § 1332(c)(2).

10. As Plaintiff and Defendants are thus citizens of different states, complete diversity exists under 28 U.S.C. § 1332(a).

VENUE AND PROCEDURAL REQUIREMENTS

11. The Supreme Court is located within this District. Accordingly, venue in this Court is proper under 28 U.S.C. § 1441(a).

12. Upon receiving a file-marked copy of this Notice of Removal, a file-marked copy of this Notice of Removal and the accompanying filings will be served upon counsel for Plaintiff and filed with the Clerk of the Supreme Court of the State of New York, Nassau County, as required by 28 U.S.C. § 1446(d).

13. This Notice of Removal is timely filed under 28 U.S.C. § 1446(b) because the Secretary of State was served on May 8, 2014, and Defendants are filing this Notice of Removal within 30 days of service.

14. Defendants have given the undersigned attorneys authority to sign and file this Notice of Removal.

WHEREFORE, Defendants Google Data Inc., Google Inc., and Google Information Inc. respectfully request that the action captioned as *Alliance Harm Recovery, LLC v. Google Data Inc., Google Inc., and Google Information Inc.*, Index No. 601 936/14, pending in the Supreme Court of the State of New York, County of Nassau, be removed to this Court, and that this Court exercise its subject-matter jurisdiction over this action, and for such other relief as the Court may deem just and proper.

Dated: June 9, 2014

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION

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