

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION  
C/A No.: 8:20-cv-2565-DCC

**RECEIVED**

**Oct 05 2020**

**SC Court of Appeals**

Tara Brice,

Plaintiff,

v.

Anderson County School District No. Two  
Board of Trustees, Julia Barnes, in her  
individual and official capacity, Brenda  
Cooley, in her individual and official  
capacity, and Bonnie Knight, in her  
individual and official capacity,

Defendants.

**NOTICE OF REMOVAL**

NOW COME the Defendants Julia Barnes, in her individual and official capacity, and Brenda Cooley, in her individual and official capacity (hereinafter “Defendants”), by and through their undersigned counsel, pursuant to Rule 81(c), Federal Rules of Civil Procedure, to remove the above-captioned case filed by Plaintiff Tara Brice (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 Anderson County on or about May 22, 2020.
2. Defendants were served on or about June 9, 2020.
3. Plaintiffs’ allegations purport to state claims for alleged violations of 42 U.S.C. § 1983.
4. Such claims present 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. All Defendants consent to this removal.

7. Exhibit A is a copy of “all process, pleadings, and orders served upon” the Defendants in this action, as required by 28 U.S.C. § 1446(a).

8. In accordance with 28 U.S.C. § 1446(d), Defendants are 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 Anderson County.

Dated this the 9th day of July, 2020.

RICHARDSON PLOWDEN & ROBINSON,  
P.A.

/s/ Eugene H. Matthews

Eugene H. Matthews, ID #7141

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**COUNSEL FOR DEFENDANTS JULIA BARNES  
AND BRENDA COOLEY, IN THEIR INDIVIDUAL  
AND OFFICIAL CAPACITIES**