

CRAIG CARPENITO
United States Attorney
JOHN F. BASIAK JR.
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALEXANDER Z. MURGULY,

Plaintiff,

v.

GOOGLE LLC, KELLY LOCKE,
CHASE BANK, TCF NATIONAL
BANK, FEDERAL BUREAU OF
INVESTIGATION,

Defendants.

Civil Action No. 19-cv-14471

**NOTICE OF REMOVAL AND
SUBSTITUTION OF DEFENDANT**

To: CLERK
Superior Court of New Jersey
Hunterdon County
Law Division, Special Civil Part
65 Park Avenue, Second Floor
P.O. Box 1069
Flemington, NJ 08822

ALEXANDER Z. MURGULY
304 Jamestown Court
Flemington, NJ 08822
(609) 664-8468
Pro se Plaintiff

PLEASE TAKE NOTICE that this action, previously pending in the Superior Court of New Jersey, Hunterdon County, Law Division, Special Civil Part, Docket No. HNT-DC-000742-19 (the "State Court Action"), is removed by defendant Federal Bureau of Investigation ("FBI") to the United States District Court for the District of New Jersey under 28 U.S.C. § 2679(d) or, in the alternative, under 28 U.S.C. § 1441(a).

PLEASE TAKE FURTHER NOTICE that under 28 U.S.C. § 2679, the United States of America is substituted for defendant FBI with respect to all claims set forth against the FBI in the complaint.

The United States of America, by and through its undersigned attorneys, respectfully states the following in support of the removal of the State Court Action:

1. On May 20, 2019, plaintiff Alexander Z. Murguly (“Plaintiff”) filed the State Court Action against numerous defendants, including the FBI. *See* Ex. 1 (complaint).
2. The FBI is a federal agency within the Department of Justice, which is part of the federal government.
3. The complaint was delivered to the FBI on or about May 29, 2019 via certified mail, but has not been served on the United States under Rule 4(i) of the Federal Rules of Civil Procedure. *See* Ex. 2 (certified mail receipt).
4. In his complaint, Plaintiff alleges the tort of negligence. Ex. 1 at 5.¹ Specifically, Plaintiff alleges that he was the victim of a “fraud scheme” involving an accounting internship. Ex. 1 at 3, 5. Plaintiff further alleges that the FBI had “duty of care to the United States and its people,” including Plaintiff, to protect him against this fraud scheme. *Id.* at 5-6. Finally, Plaintiff alleges that the FBI breached this duty of care by “fail[ing] to act successfully” on “intelligence” and protect Plaintiff from this fraud scheme. *Id.* at 5.
5. Pursuant to 28 U.S.C. § 2679(a), the only manner in which a plaintiff

¹ The page numbers in Plaintiff’s complaint do not match the PDF page numbers. The FBI’s pinpoint citations to the complaint reference the PDF page numbers.

may bring a tort claim for alleged negligence of an agency or employee of the United States is under the Federal Tort Claims Act (“FTCA”).

6. Under the FTCA, the only proper defendant is the United States, not a federal agency or employee. *See Dilg v. United States Postal Serv.*, 635 F. Supp. 406, 407 (D.N.J. 1985) (“[T]he United States is the only proper defendant in a suit for personal injuries arising out of the negligence of federal employees.”).

7. Under the FTCA, the United States District Courts have exclusive jurisdiction over tort actions filed against the United States. 28 U.S.C. § 1346(b).

8. Any civil action alleging such claims commenced in a state court shall be removed without bond at any time before trial to the district court of the United States for the district and division embracing the place in which the action or proceeding is pending.

9. The United States District Court for the District of New Jersey is the district embracing the place in which the State Court Action is pending.

10. A copy of this notice of removal will be electronically filed via eCourts with the Clerk of the Superior Court of New Jersey, Hunterdon County, Law Division, Special Civil Part. *See* Ex. 3 (letter to the clerk of the Superior Court).

11. Additionally, copies of this notice of removal will be served on Plaintiff via eCourts and U.S. mail.

12. However, since no state court judge is currently assigned to the State Court Action, no courtesy copies will be provided to chambers.

THEREFORE, the State Court Action is hereby removed to the United States District Court for the District of New Jersey for further proceedings, and the United

States of America has been substituted for the FBI under 28 U.S.C. § 2679(a).

CRAIG CARPENITO
United States Attorney

By: /s/ John F. Basiak Jr.
JOHN F. BASIAK JR.
Assistant U.S. Attorney

Dated: June 28, 2019

Exhibit 1

Form A

Alexander Z. Murguly
Plaintiff's Name (first, middle, last)
304 Jamestown Ct.
Street Address
Flemington NJ 08822
City, State, Zip
(609) 664-8468
Telephone Number
[SEE ADDITIONAL PAGES] and others
GOOGLE LLC
Defendant's Name (first, middle, last)
1600 AMPHITHEATRE PARKWAY, MOUNTAIN VIEW
Street Address
CA 94043
City, State, Zip
Telephone Number

Superior Court of New Jersey
Law Division, Special Civil Part
Hunk-don County
Docket Number

(to be provided by the court)
RECEIVED/FILED
SUPERIOR COURT
MAY 20 2019
HUNTERDON COUNTY DEPUTY CLERK
Civil Action: BATCH NO: 199
DATE: 5-20-19
PAYMENT: CA/CR/MO
CKMO #: 5801
AMOUNT: 130
PREPARER: mal

Type or print the reasons you, the Plaintiff(s), are suing the Defendant(s): (See instruction B)
Attach additional sheets if necessary.

[SEE ADDITIONAL PAGES]
NEGLIGENCE.

The amount you, the Plaintiff(s) are demanding from the Defendant(s) \$ 14,999.99

At the trial Plaintiff will need:

- An interpreter Yes No Indicate language: _____
- An accommodation for disability Yes No Indicate accommodation _____

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

May 17, 2019
Date

Alex Murguly
Your Signature
Alexander Z. Murguly
Name Typed, Stamped or Printed

FORM A

DEFENDANTS:

~~MITOSORE ANTIBODY OF CHASE BANK (ACCOUNT # 623697153)
ADDRESS UNAVAILABLE UNTIL DISCOVERY~~

KELLY LOCKE OF US BANK (ACCOUNT # 104794153445)
6906 MISTY MEADOW LANE
ARLINGTON TEXAS 76002

~~MATHEW ALL OF BANK OF AMERICA (ACCOUNT # 446047810045)
ADDRESS UNAVAILABLE UNTIL DISCOVERY~~

~~SEANA BROWN OF SEANABROWN OUTLOOK.COM
ADDRESS UNAVAILABLE UNTIL DISCOVERY~~

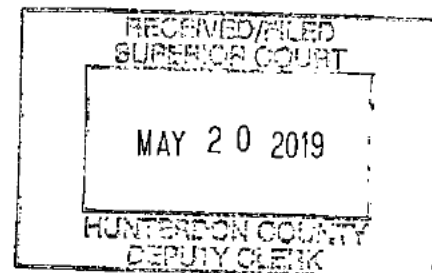
~~GOOGLE LLC~~

~~1600 AMPHITHEATRE PARKWAY, MOUNTAIN VIEW
CA 94043, UNITED STATES~~

CHASE BANK
270 PARK AVENUE, MANHATTAN
NEW YORK CITY, NEW YORK, USA

TCF NATIONAL BANK
200 LAKE STREET EAST WYAZATA
MN 55391-1693, USA

FEDERAL BUREAU OF INVESTIGATION
935 PENNSYLVANIA AVENUE
NW WASHINGTON, D.C. 20535-0001



DAMAGES:

\$2632.00 MOYOSORE AJIBODU
\$2800.00 MOYOSORE AJIBODU, SEANA BROWN, KELLY LOCKE, AND MATHEW ALI
\$7651.95 GOOGLE LLC
\$956.5 CHASE BANK
\$956.5 TCF NATIONAL BANK
\$3.04 FEDERAL BUREAU OF INVESTIGATION
= \$14,999.99

GOOGLE LLC'S DAMAGES ARE ABOUT 50% OF $(14,999.99 - 2,632 - 2,800 - 3.04)$
CHASE BANK'S DAMAGES ARE ABOUT 10% OF $(14,999.99 - 2,632 - 2,800 - 3.04)$
TCF NATIONAL BANK'S DAMAGES ARE ABOUT 10% OF $(14,999.99 - 2,632 - 2,800 - 3.04)$

REASONS:

DEFENDANTS ARE IMPLICATED IN SOME WAY AS APART OF OR ENABLING OR FAILING TO STOP A FRAUD SCHEME INVOLVING A FRAUDULENT 2019 SUMMER INTERNSHIP AT BERRY GLOBAL, INC.

MONTHS PRIOR TO MARCH 2019 I SETUP A GOOGLE ALERT CONNECTED TO GOOGLE LLC'S JOB-SEARCHER TOOL FOR 'ACCOUNTING INTERNSHIPS'.

3/22/19: I RECEIVED AN E-MAIL FROM 'JOB ALERTS FROM GOOGLE LLC'. I APPLIED TO ACCOUNTING INTERNSHIPS USING LINKS PROVIDED BY GOOGLE LLC, INCLUDING THE FIRST LISTING OF 'FINANCE / ACCOUNTING SUMMER INTERNSHIP' AT BERRY GLOBAL, INC.

4/09/19: I RECEIVED AN E-MAIL FROM CAREER OPPORTUNITIES@BERRY-GLOBAL.COM ENTITLED 'INVITATION TO INTERVIEW AT BERRY GLOBAL INC FOR THE POSITION OF FINANCE / ACCOUNTING SUMMER INTERNSHIP'. I DOWNLOADED THE WIRE INSTANT MESSENGER APP TO BE INTERVIEWED BY @SEANABROWN.

4/10/19: I RECEIVED AN E-MAIL FROM SEANA BROWN'S SEANA.BROWN@OUTLOOK.COM ENTITLED 'PAY CHECK REGARDING PRE INTERN TRAINING MATERIALS', INCLUDING A \$2800 TCF NATIONAL BANK CHECK FOR TRAINING SUPPLIES. I E-DEPOSITED THE CHECK WITH MY

CHASE APP. FUNDS OF \$2800 APPEARED TO BE MADE AVAILABLE TO ME IN MY CHECKING ACCOUNT BY CHASE BANK WITHIN 24 HOURS.

4/15/19: I WITHDREW \$2620.00 TO PURCHASE A MONEY ORDER FROM A LOCAL USPS TO SEND TO A VENDOR DETERMINED BY SEANA BROWN.

4/15/19: I DEPOSITED \$2620.00 TO VENDOR MOYOSORE AJIBODU'S CHASE BANK ACCOUNT (#623697153).

4/17/19: MY CHECKING ACCOUNT NOTES A BOUNCED CHECK, 'DEPOSITED ITEM RETURNED REFER TO MAKER', FOR \$2800.00 AND A 'DEPOSIT ITEM RETURNED FEE' OF -\$12.00. I DETERMINED THAT THE INTERNSHIP IS FRAUDULENT.

4/22/19: I CALLED CHASE'S CUSTOMER SERVICE AND A MANAGER-TYPE STATES THAT \$2800 IN FUNDS WERE NOT TRANSFERRED FROM TCF NATIONAL BANK BUT WERE STILL MADE AVAILABLE TO ME AS A COURTESY.

MOYOSORE AJIBODU OWES ME DAMAGES FOR DEFRAUDING ME. MR. AJIBODU IS TIED TO A FRAUD SCHEME AS A VENDOR WHO I MADE A PAYMENT TO FOR FICTITIOUS TRAINING SUPPLIES FOR A BERRY GLOBAL, INC. 2019 SUMMER INTERNSHIP FRAUD SCHEME.

SEANA BROWN OWES ME DAMAGES FOR ORCHESTRATING THE DEFRAUDING OF ME. MS. BROWN DEFRAUDED ME DURING THE BERRY GLOBAL, INC. 2019 SUMMER INTERNSHIP PRE-INTERVIEW, INTERVIEW, AND PRE-TRAINING STAGES.

KELLY LOCKE COULD SHARE IN DAMAGES FOR TIES TO THE BERRY GLOBAL, INC. 2019 SUMMER INTERNSHIP FRAUD SCHEME AS A LISTED RECIPIENT OF FUNDS DURING THE PRE-TRAINING STAGE BY SEANA BROWN.

MATHEW ALI COULD SHARE IN DAMAGES FOR TIES TO THE BERRY GLOBAL, INC. 2019 SUMMER INTERNSHIP FRAUD SCHEME AS A LISTED RECIPIENT OF FUNDS DURING THE PRE-TRAINING STAGE BY SEANA BROWN.

GOOGLE LLC OWES ME DAMAGES FOR THEIR NEGLIGENCE REGARDING THEIR PRINCIPLE #6 OF THEIR 'PRIVACY AND SECURITY PRINCIPLES' AND FOR A BREACH OF THEIR TERMS OF SERVICE WHEN, AS SHOWN BY MY RECEIVING OF THE GOOGLE ALERT E-MAIL INCLUDING WHAT IS NOW KNOWN TO BE A FRAUDULENT INTERNSHIP LISTING, THEY FAILED TO "DETECT AND PROTECT AGAINST EVOLVING ONLINE THREATS" AND TO "BUILD THE STRONGEST SECURITY TECHNOLOGIES INTO OUR PRODUCTS". THAT FRAUDULENT INTERNSHIP LISTING IS A FORESEEABLE ONLINE THREAT. GOOGLE LLC FAILED TO PREVENT THAT LISTING IN THEIR GOOGLE SEARCH JOB-SEARCHER TOOL IN A WAY THAT WOULD HAVE PREVENTED A GOOGLE ALERT CONTAINING THE FRAUDULENT INTERNSHIP APPLICATION LINK.

CHASE BANK OWES ME DAMAGES FOR NEGLIGENCE INVOLVING A CHECK WHEN CHASE FAILED TO TRIGGER THE EXCEPTION, FROM THE FEDERAL RESERVE BANK'S CONSUMER COMPLIANCE HANDBOOK, OF REASONABLE CAUSE TO DOUBT COLLECTIBILITY (§ 229.13(E)) WHEN CHASE SHOULD HAVE HAD A "REASONABLE CAUSE TO BELIEVE THAT THE CHECK IS NOT COLLECTIBLE" AND NEEDED TO "DISCLOSE THE BASIS FOR THE EXTENDED HOLD TO THE CUSTOMER". REGARDING NON-COLLECTIBILITY, THERE WAS NO DISCLOSURE AND NO EXTENDED HOLD WHEN THERE SHOULD HAVE BEEN. CHASE APPEARED TO HAVE MADE FUNDS OF \$2800 AVAILABLE WITHIN 24 HOURS OF CHECK DEPOSIT. CHASE'S SYSTEMS FAILED TO DOUBT COLLECTIBILITY OF A CHECK LINKED TO A FRAUD SCHEME.

TCF NATIONAL BANK COULD OWE ME DAMAGES FOR NEGLIGENCE BY ALLEGEDLY HAVING INFORMATION ABOUT THE ACCOUNT HAVING INSUFFICIENT FUNDS OF \$2800 THAT SHOULD HAVE BEEN COMMUNICATED TO CHASE BANK THAT WOULD HAVE LED TO THE FUNDS NOT BEING MADE AVAILABLE TO ME. TCF NATIONAL BANK FAILED TO TRIGGER THE EXCEPTION, FROM THE FEDERAL RESERVE BANK'S CONSUMER COMPLIANCE HANDBOOK, OF REASONABLE CAUSE TO DOUBT COLLECTIBILITY (§ 229.13(E)).

FEDERAL BUREAU OF INVESTIGATION OWES ME DAMAGES FOR NEGLIGENCE. THE FBI HAD INTELLIGENCE REGARDING THIS FRAUD SCHEME. THEY APPEARED TO FAIL TO ACT SUCCESSFULLY ON THAT INTELLIGENCE BETWEEN ABOUT DECEMBER 2017 AND ABOUT MARCH 2019. THEIR NEGLIGENCE IS SHOWN BY THE FACT THAT I WAS DEFRAUDED BY THE SAME FRAUD SCHEME THE FBI KNEW OF. SINCE THE FBI HAD INTELLIGENCE REGARDING THE FRAUD SCHEME, AND I LEARNED OF THIS FOLLOWING THE 4/17/19 BOUNCED CHECK INCIDENT REMOTELY, THE FBI HAD/HAS A DUTY OF CARE TO THE UNITED STATES AND ITS PEOPLE TO, AND TAKEN FROM THE ATTORNEY GENERAL'S GUIDELINES FOR DOMESTIC FBI OPERATIONS, "PROTECT THE UNITED STATES AND ITS PEOPLE FROM CRIMES

IN VIOLATION OF FEDERAL LAW AND THREATS TO NATIONAL SECURITY" THAT PROTECTION DID NOT
OCCUR FOR THE PEOPLE BETWEEN DECEMBER 2017 AND MARCH 2019 — OVER ONE YEAR.
BEYOND A REASONABLE POINT IN TIME, THE FBI IS NEGLIGENT.

x Alex Murphy May 5, 2019

Form B



Court's Address and Phone Number:

Special Civil Part
65 Park Ave, Flemington NJ 08822

Telephone No. _____

Superior Court of New Jersey
 Law Division, Special Civil Part

Hunterdon County
 Docket No: DC _____

Civil Action
SUMMONS

Check one Contract Tort

YOU ARE BEING SUED!

Person or Business Suing You (Plaintiff)

Alexander Murghy
304 Jamestown Ct.
Flemington NJ 08822

Person or Business Being Sued (Defendant)

Google LLC
1606 Amphitheatre Parkway, Mountain View
CA 94043, United States

(See the following page(s) for additional plaintiffs)

(See the following page(s) for additional defendants)

Plaintiff's Attorney Information

n/a

RECEIVED/FILED
 SUPERIOR COURT

MAY 20 2019

HUNTERDON COUNTY
 DEPUTY CLERK

The Person or Business Suing You Claims You Owe the Following:

Demand Amount	\$	0.00
Filing Fee	\$	0.00
Service Fee	\$	0.00
Attorney's Fees	\$	14,999.99
TOTAL	\$	0.00

14,999.99

FOR JUDICIAL USE ONLY

In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.

IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE _____, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:

- Answer the complaint.** An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Clerk's Offices or on the Judiciary's Internet site www.njcourts.com under the section for Forms. If you decide to file an answer to the complaint made against you:
 - Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: *Treasurer, State of New Jersey*. Include DC _____ (your Docket Number) on the check.
 - Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.
 - Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before _____.
- Resolve the dispute.** Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the SIGNED agreement to the court's address listed above on or before _____.

Please Note - You may wish to get an attorney to represent you. If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at _____. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at _____. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.

/s/ Name _____

Acting Deputy Clerk of the Superior Court



Dirección y teléfono del tribunal:
 Parte Civil Especial de _____

 Número de teléfono: _____

El Tribunal Superior de Nueva Jersey
 División de Derecho, Parte Civil Especial
 Condado de _____
 Número del expediente: DC _____
 Demanda de Acción Civil
NOTIFICACIÓN DE DEMANDA
 Marque si es Contrato Ilícito Civil

¡LE ESTÁN DEMANDANDO!

Persona o entidad comercial que le está demandando (el demandante)

El Demandante: Consigne la información al dorso: (Vea en la(s) página(s) siguiente(s) los demandantes adicionales)

Información sobre el abogado del demandante

El Demandante: Consigne al dorso la información sobre el abogado del demandante.

Persona o entidad comercial que está siendo demandada (el demandado)

El Demandante: Consigne la información al dorso: (Vea en la(s) página(s) siguiente(s) los demandados adicionales)

La persona o entidad comercial que le está demandando afirma que usted le debe lo siguiente:

Cantidad a la vista	\$XXXXXXXXXX
Tasa judicial	\$XXXXXXXXXX
Cargo del emplazamiento	\$XXXXXXXXXX
Honorarios del abogado	\$XXXXXXXXXX
TOTAL	\$XXXXXXXXXX

PARA USO EXCLUSIVO DEL PODER JUDICIAL

En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. Si usted **no responde a la demanda**, puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado. Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.

SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL _____, O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:

- Responder a la demanda.** Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial www.njcourts.com bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra:
 - Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya el número DC _____ (el número de su expediente) en el cheque.
 - Envíe por correo el formulario de Respuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.
 - Entregue personalmente o envíe por correo común una copia del formulario de Respuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto **SE TIENE** que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el _____.
- Resolver la disputa.** Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. Si llegara a un acuerdo, envíe por correo el acuerdo **FIRMADO** a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el _____.

Nota - Puede que usted quiera conseguir que un abogado para que lo represente. Si usted no puede pagar un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al _____. Si usted puede pagar un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al _____. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.

/s/ Nombre y apellido _____
 Subsecretario(a) interino(a) del Tribunal Superior



Court's Address and Phone Number:
Special Civil Part
RECEIVED/FILED
SUPERIOR COURT
MAY 20 2019

Superior Court of New Jersey
Law Division, Special Civil Part
County _____
Docket No: DC: _____
Civil Action
SUMMONS
Check one Contract Tort

Additional Plaintiffs/demandantes adicionales

Additional Defendants/demandados adicionales

Kelly Locke
6006 Misty Meadow Lane
Arlington Texas 76002

~~Chase Bank
270 Park Avenue
New York City, New York, USA~~

Chase Bank
270 Park Avenue Manhattan
New York City, New York, USA

TCF National Bank
200 Lake Street East Wayzata
MN 55391-1693, USA

Federal Bureau of Investigation
955 Pennsylvania Avenue
NW Washington, D.C. 20535-0001



Court's Address and Phone Number:
 HUNTERDON Special Civil Part
 65 PARK AVENUE, SECOND FLOOR
 FLEMINGTON, NJ 08822-0000
 908-824-9750 ext.13810

Superior Court of New Jersey
 Law Division, Special Civil Part
 HUNTERDON County
 Docket No: HNT-DC-000742-19
 Civil Action
 TORT-NEGLIGENCE

YOU ARE BEING SUED!

Person or Business Suing You (Plaintiff)

ALEXANDER Z MURGULY

See Page 3 for additional Plaintiff list

Plaintiff's Attorney Information

Person or Business Being Sued (Defendant)

GOOGLE LLC

See Page 3 for additional Defendant list

The Person or Business Suing You Claims You Owe the Following:

Demand Amount	\$14999.99
Filing Fee	\$95.00
Service Fee	\$35.00
Attorney's Fees	\$0.00
TOTAL	\$15129.99

FOR JUDICIARY USE ONLY

In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. **If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement.** If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.

IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE 07/01/2019, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:

- Answer the complaint.** An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Offices or on the Judiciary's Internet site njcourts.gov under the section for Forms. If you decide to file an answer to the complaint made against you:
 - Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: *Treasurer, State of New Jersey*. Include **HNT-DC-000742-19** (your Docket Number) on the check.
 - Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.
 - Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This **MUST** be done at the same time you file your Answer with the court on or before **07/01/2019**.
- Resolve the dispute.** Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the **SIGNED** agreement to the court's address listed above on or before **07/01/2019**.

Please Note - You may wish to get an attorney to represent you. If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at 908-782-7979. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at 908-200-7822. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.

/s/ Michelle M. Smith

Clerk of the Superior Court



Dirección y teléfono del tribunal
 Parte Civil Especial de HUNTERDON
 65 PARK AVENUE, SECOND FLOOR
 FLEMINGTON, NJ 08822-0000
 908-824-9750 ext.13810

El Tribunal Superior de Nueva Jersey
División de Derecho, Parte Civil Especial
 Condado de HUNTERDON
 Número del expediente HNT-DC-000742-19
Demanda de Acción Civil
NOTIFICACIÓN DE DEMANDA
TORT-NEGLIGENCE

¡LE ESTÁN DEMANDANDO!

Persona o entidad comercial que le está demandando (el demandante)

ALEXANDER Z MURGULY
 See Page 3 for additional Plaintiff list

Información sobre el abogado del demandante

Persona o comercial ser demandada (el demandado)

GOOGLE LLC

See Page 3 for additional Defendant list

La persona o comercial que le está demandando afirma que usted le debe lo siguiente:

Cantidad a la vista	\$14999.99
Tasa judicial	\$95.00
Cargo del emplazamiento	\$35.00
Honorarios del abogado	\$0.00
TOTAL	\$15129.99

PARA USO EXCLUSIVO DEL PODER JUDICIAL

En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. **Si usted no responde a la demanda puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado.** Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.

SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL 07/01/2019 O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:

- 1. Responder a la demanda.** Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial njcourts.gov bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra:
 - Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya HNT-DC-000742-19 (el número de su expediente) en el cheque.
 - Envíe por correo el formulario de Respuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.
 - Entregue personalmente o envíe por correo común una copia del formulario de Respuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el 07/01/2019.
- 2. Resolver la disputa.** Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. **Si llegara a un acuerdo, envíe por correo o entregue personalmente el acuerdo FIRMADO** a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el 07/01/2019.

Nota - Puede que usted quiera conseguir que un abogado para que lo represente. Si usted no puede pagar a un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al 908-782-7979. Si usted puede pagar a un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al 908-200-7822. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.

/s/ Michelle M. Smith

Subsecretario(a) del Tribunal Superior



Court's Address and Phone Number:
HUNTERDON Special Civil Part
65 PARK AVENUE, SECOND FLOOR
FLEMINGTON, NJ 08822-0000

908-824-9750 ext.13810

**Superior Court of New Jersey
Law Division, Special Civil Part
HUNTERDON County**
Docket No: **HNT-DC-000742-19**
Civil Action
SUMMONS
TORT-NEGLIGENCE

Additional Plaintiffs/demandantes adicionales

Additional Defendants/demandados adicionales

KELLY LOCKE
CHASE BANK
TCF NATIONAL BANK
FEDERAL BUREAU OF INVESTIGATION

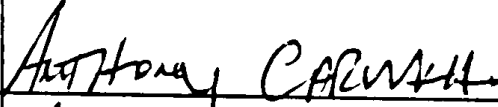

Exhibit 2

Date Produced: 06/03/2019

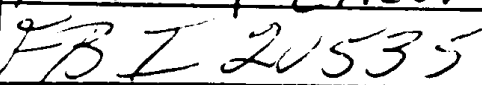
STATE OF NEW JERSEY:

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Exhibit 3



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

CRAIG CARPENITO
UNITED STATES ATTORNEY

John F. Basiak Jr.
Assistant United States Attorney

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Trenton, NJ 08608
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direct: (609) 858-0309
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June 28, 2019

Via eCourts

Clerk, Superior Court of New Jersey
Hunterdon County
Law Division, Special Civil Part
65 Park Avenue, Second Floor
P.O. Box 1069
Flemington, NJ 08822

**Re: *Murguly v. Google LLC, et al.*, Docket No. HNT-DC-000742-19
Notice of Removal**

Dear Sir or Madam:

Enclosed is a notice of removal and a civil cover sheet filed with the United States District Court for the District of New Jersey for the above-referenced matter.

Pursuant to 28 U.S.C. § 1446(d), effective upon the filing of the notice of removal in the Superior Court, this matter is removed to the federal district court. The statute directs that the state court "shall proceed no further" with this matter unless the case is remanded. Thank you for your assistance with this matter.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

By: /s/ John F. Basiak Jr.
JOHN F. BASIAK JR.
Assistant U.S. Attorney

cc: Plaintiff (via eCourts and U.S. mail)
Co-Defendants (via U.S. mail)