

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS CHRONICLE
611 E. Martin Luther King Blvd.
Chattanooga, TN 37403,

THEHUFFINGTONPOST, INC.
111 E. 18th Street
New York, NY 10003,

REPRESENTATIVE STEVE COHEN
2104 Rayburn House Office Building
Washington, DC 20515,

US DOMINION, INC.
1201 18th Street, Suite 210
Denver, CO 80202,

DOMINION VOTING SYSTEMS, INC.
1201 18th Street, Suite 210
Denver, CO 80202,

DOMINION VOTING SYSTEMS
CORPORATION
1201 18th Street, Suite 210
Denver, CO 80202,

MEDIA MATTERS FOR AMERICA
75 Broadway Street, Suite 202
San Francisco, CA 94111,

Civil Action No. 1:21-cv-317

OHIO INTELLIGENCE TIPS

2911 Beaumont Avenue
Massillon, OH 44647,

ROSS ELDER

2911 Beaumont Avenue
Massillon, OH 44647,

ALI ABDUL RAZAQ AKBAR A/K/A ALI

ALEXANDER

5125 Pinellas Avenue
Keller, TX 76244

Defendants.

NOTICE OF REMOVAL

1. Pursuant to 28 U.S.C. §§ 1442 and 1446, Defendant, the Honorable Steve Cohen, U.S. Representative for the 9th congressional district of Tennessee, hereby removes to this Court the complaint filed against him in the Circuit Court of Hamilton County, Tennessee by Plaintiff, Terpsehore Maras. *See* Am. Compl. (Nov. 29, 2021) (attached as Exhibit B); Docket Sheet (attached as Exhibit C).
2. Ms. Maras alleges that Congressman Cohen defamed Plaintiff in a Twitter post made on his official account. Am. Compl. ¶¶ 62, 64. Specifically, Congressman Cohen shared a news article about Sidney Powell and the November 2020 election on his official Twitter account, though the tweet did not mention Plaintiff. *Id.* Plaintiff alleges that when “Defendants publish defamatory statements against Attorney Sidney Powell, the Kraken or any of Attorney Sidney Powell’s election fraud accusations and/or conclusions, the Defendants are defaming Plaintiff.” Am. Compl. ¶ 32. In addition to “compensatory

damages of not less than \$1,700,000,000,” “punitive damages of not less than \$1,700,000,000,” and expenses, costs, and interest, Ms. Maras seeks a “permanent injunction requiring the removal of Defendants’ statements that are determined to be false and defamatory and enjoining the Defendants from repeating such statements in the future.” Am. Compl. at 18-19.

3. Removal of this action is appropriate pursuant to 28 U.S.C. § 1442(a)(4), inasmuch as (1) the claims brought against Congressman Cohen arise from his official capacity as a Member of Congress, and (2) Congressman Cohen can raise one or more colorable federal defenses to the Complaint, including but not limited to, sovereign immunity and failure to exhaust administrative remedies under the Federal Tort Claims Act.
4. Removal of this action is timely under 28 U.S.C. § 1446(b)(1). Congressman Cohen received a copy of the initial pleadings on November 29, 2021, and filed this Notice within the 30-day statutory time limitation.
5. Contemporaneously with the filing of this Notice, a copy of the Notice is being lodged with the Clerk of the Circuit Court for Hamilton County, Tennessee. *See* 28 U.S.C. § 1446(d).

Respectfully submitted,

/s/ Douglas N. Letter
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General Counsel
TODD B. TATELMAN (VA Bar No. 66008)
Principal Deputy General Counsel
SARAH CLOUSE (MA Bar No. 688187)
Associate General Counsel

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Counsel for Congressman Steve Cohen

December 27, 2021

¹ Attorneys in the U.S. House of Representatives Office of General Counsel are “entitled, for the purpose of performing the counsel’s functions, to enter an appearance in any proceeding before any court of the United States or of any State or political subdivision thereof without compliance with any requirements for admission to practice before such court.” 2 U.S.C. § 5571(a).

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2021, I caused the foregoing document to be filed via the CM/ECF system for the U.S. District Court for the Eastern District of Tennessee and served a copy via electronic mail on the following non-registered CM/ECF filers:

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/s/ Douglas N. Letter
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