## United States District Court Eastern District of Virginia

Alexandria Division



PAUL SHAO,

Plaintiff,

٧.

ALLSTATE INSURANCE COMPANY,
Defendant.

Civil Action No. 1:21-cv-00482

Circuit Court for County of Fairfax Civil Action No. 2021-03802

## **MOTION TO REMAND**

Plaintiff Paul Shao hereby moves this Honorable Court, pursuant to 28 U.S.C. §1332(a) and §1447(c) to remand this action to the Circuit Court for County of Fairfax, Virginia in consideration that an agreement has been reached between Paul Shao and Mr. Scott Humphrey of SEYFARTH SHAW LLP, the outside and lead attorney for the defendant, Allstate Insurance Company. The agreement is that, if Paul Shao consented to do a Declaration, stating that his demand is equal to or less than the sum of \$70,313.33, Defendant would agree to remand the case back to the Circuit Court. In support of the present motion, a *Declaration of Paul Shao* and an *Affidavit of Paul Shao on the Exchanges between Him and Mr. Scott Humphrey* are filed in this Honorable Court simultaneously.

WHEREFORE, plaintiff Paul Shao respectfully requests this Honorable Court to enter an Order to remand this action to the Circuit Court for County of Fairfax, Virginia.

DATED: May 4, 2021

PAUL SHAO,

Pro Se Litigant

Paul Shao

9233 Lee Masey Drive, Lorton, Virginia 22079 (202) 290-6300 Telephone paulyshao@gmail.com

## **CERTIFICATE OF SERVICE**

I certified that on May 4, 2021, a copy of the foregoing Declaration of Paul Shao was filed with the clerk's office of the Court, emailed, and mailed to Defendant at the following address:

J. Scott Humphrey <u>shumphrey@seyfarth.com</u> SEYFARTH SHAW LLP 233 S. Wacker Dr., Suite 800 Chicago, IL 60606-6448

Renée B. Appel, Esq.
rapel@sayfarth.com
SEYFARTH SHAW LLP
975 F Street, N.W.
Washington, DC 20004-1454

Paul Shao

UNITE	D STATES DISTRICT COURT
EASTE	RN DISTRICT OF VIRIGINIA
	DIVISION



PAUL SHAO

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Civil Action Number: 1: 20-cv-00 482

Allstate Insurance Company
Defendant(s).

## LOCAL RULE 83.1(M) CERTIFICATION

EOCAL ROLL 03.1(III) CLICITION
I declare under penalty of perjury that:  No attorney has prepared, or assisted in the preparation of Motion to Remand and  (Title of Document)  PANL SHA O  Name of Pro Se Party (Print or Type)  Exchanges bet. HZM & Mr. Scott  Humphrey
Executed on:(Date) OR
The following attorney(s) prepared or assisted me in preparation of <u>Jedaration</u> of <u>Paul Share</u> (Title of Document)  (Name of Attorney)
233 S. Wacker Dr., Suite foo, Chicago, IL 60606  (Address of Attorney)  312-460-500  (Telephone Number of Attorney)  Prepared, or assisted in the preparation of, this document
Name of Pro Se Party (Print or Type)  Signature of Pro Servarty  Executed on: 5/4/202 (Date)
Executed on Signature of the State of the St