

United States District Court
Eastern District of Virginia
Alexandria Division

FILED
2023 JUN 27 PM 3:07

PAUL SHAO,
Plaintiff,

v.

Civil Action No. 1:23-cv-00809

ALLSTATE INSURANCE COMPANY,
Defendant.

**DECLARATION OF PAUL SHAO IN SUPPORT OF HIS MOTION TO
REMAND**

I, Paul Shao, declare as follows:

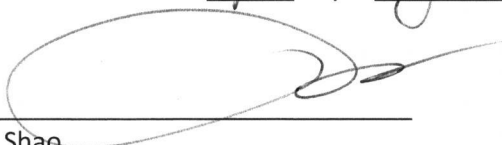
1. I am over 18 years of age and am fully competent to testify about the matters stated in this Declaration.
2. I am an individual residing at 9233 Lee Masey Drive, Lorton, Fairfax County, Virginia 22079.
3. I have been engaged in litigation with Allstate since 3/15/21.
4. On 5/12/23, Plaintiff Shao filed the *Complaint after Nonsuit* with twelve causes of action at the Fairfax Circuit Court.
5. On 6/22/23, Allstate filed a *Notice of Removal* of the State Court Lawsuit to this Court, initiating the above-captioned action.

6. Allstate's *Notice of Removal* stated that diversity jurisdiction in this Court was proper because Allstate argued that Plaintiff Shao has alleged Federal Title VII of the Civil Rights Act of 1964, ADA, and ADEA claims in his *Complaint after Nonsuit*.

7. On 6/27/23, Shao filed a *Plaintiff's Motion to Remand*, in which Shao admitted his mistakes by omitting the inclusion of the Virginia Human Rights Act (VHRA) in his complaint and proposed that he would file a *Declaration of Paul Shao in Support of His Motion to Remand* to making the promise to make an amended complaint which will add and incorporate the VHRA in Shao's claims for violations of his human right due to discrimination.

Under penalties of perjury, I declare that I have made the foregoing Declaration and that the facts stated in it are true to the best of my knowledge and belief.

Executed this 27th day of June, 2021 at Alexandria, VA



Paul Shao

CERTIFICATE OF SERVICE

I certified that on June 27, 2023, 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

Katie M. Burnett

Laura Seferian

Benesch, Friedlander, Coplan & Aronoff LLP

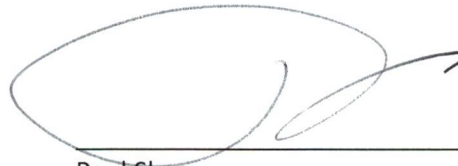
71 South Wacker Drive, Suite 1600

Chicago, Illinois 60606-4637

shumphrey@beneschlaw.com

kburnett@beneschlaw.com

lseferian@beneschlaw.com

A handwritten signature in black ink, appearing to be 'Paul Shao', is written over a horizontal line. The signature is stylized and cursive.

Paul Shao

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
DIVISION

Paul SHAO

Plaintiff(s),

v.

Civil Action Number: 1:23-cv-00809

Allstate Insurance Company

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

① Plaintiff's Motion
to Remand
(Title of Document)

PAUL SHAO
Name of Pro Se Party (Print or Type)

[Signature]
Signature of Pro Se Party

Executed on: 6/27/2023 (Date)

② Declaration of
Paul Shao in support
of his Motion to
Remand

OR

The following attorney(s) prepared or assisted me in preparation of _____
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)
Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: _____ (Date)