

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

BRIDGET SULLIVAN,

Plaintiff,

v.

PATRICK HARRIGAN,

Defendant.

Civil Action No. 1:25-CV-1016

(Formerly No. 25CV011763-330
In the General Court of Justice,
Superior Court Division,
Forsyth County, North Carolina)

NOTICE OF REMOVAL OF A CIVIL ACTION

NOW COMES the United States, by and through Clifton T. Barrett, United States Attorney for the Middle District of North Carolina, and hereby gives notice to this Court, pursuant to 28 U.S.C. § 2679(d)(2), of the removal of civil action No. 25CV011763-330 pending in the General Court of Justice, Superior Court Division, Forsyth County, North Carolina (the “State Court Action”), to the United States District Court for the Middle District of North Carolina. In support of this notice, Defendant asserts the following:

1. Upon information and belief, Plaintiff, Bridget Sullivan, commenced the State Court Action by filing her Complaint with the Forsyth County Clerk of Court on October 3, 2025. The Complaint and all other available filings are attached hereto as Government Exhibit (“GE”) A.

2. On October 6, 2025, a Civil Summons was issued directed to Patrick Harrigan, and returned in Forsyth County on October 16, 2025, showing service on defendant Harrigan on October 8, 2025. *See* GE A.

3. The State Court Action is properly subject to removal to the United States District Court for the Middle District of North Carolina pursuant to 28 U.S.C. § 2679(d)(2) because it involves a tort claim against a federal officer or employee and an appropriate Westfall Act certification has been issued under that statute and 28 C.F.R. § 15.4.

4. Specifically, United States Attorney Barrett certified that the defendant, Congressman Patrick Harrigan, was acting within the scope of his federal office or employment at the time of the incidents out of which the claim arose. A copy of the Certification is attached as Exhibit B.

WHEREFORE, pursuant to 28 U.S.C. § 2679(d)(2), the action referenced above now pending in the Superior Court Division, Forsyth County, North Carolina, is removed to the United States District Court for the Middle District of North Carolina.

This the 6th day of November, 2025.

Respectfully submitted,

CLIFTON T. BARRETT
United States Attorney

/s/ Lynne P. Klauer
LYNNE P. KLAUER
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Certificate of Service

I hereby certify that on November 6, 2025, the foregoing Notice of Removal was electronically filed with the Clerk of the District Court using the CM/ECF system, and with the Forsyth County Clerk of Court using the North Carolina eCourts system.

I hereby further certify that on November 6, 2025, copies of the document(s) were served by U.S. Mail addressed to the following non-CM/ECF/eCourts participants:

Walter C. Holton, Jr.
Holton Law Firm, PLLC
857 W. Fifth Street
Winston-Salem, NC 27101
Counsel for Plaintiff

/s/ Lynne P. Klauer
LYNNE P. KLAUER
Assistant United States Attorney