

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JOHN GREGORY LAMBROS,  
Plaintiff,

CIVIL ACTION NO. 19-cv-1929

Removed from: Superior Court  
Of the District of Columbia,  
Case No. 2017-CA-000929-B  
Judge: Florence Y. Pan

Vs.

FEDERATIVE REPUBLIC OF BRAZIL, et al.,  
Defendants.

AFFIDAVIT FORM

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MOTION TO REMAND THIS ACTION BACK TO THE SUPERIOR COURT  
OF THE DISTRICT OF COLUMBIA. See, 28 U.S.C. 1447(c); 1446(b).

Also, SUBJECT MATTER JURISDICTION QUESTION, AS THE SUPERIOR  
COURT ENTERED DEFAULT AGAINST DEFENDANTS ON APRIL 8, 2019,  
AND ORDERED AN "Ex Parte Proof Hearing" (Damage Hearing) ON  
MAY 15, 2019. See, LOCKHART vs. CADE, 728 A.2d 65 (District of  
Columbia Court of Appeals, March 4, 1999)("entry of default 'operates  
as an admission by the defaulting party that there are no issues  
of liability, but leaves the issue of damages unresolved until entry of  
judgment'") Plaintiff Lambros has no further obligation to prove  
Liability.

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COMES NOW, Plaintiff JOHN GREGORY LAMBROS (Hereinafter "MOVANT"), Pro Se,  
and requests this Honorable Court to order a "MOTION TO REMAND THIS ACTION  
BACK TO THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA. See, 28

U.S.C. 1447(c); 1446(b), as defendants have failed to plead or otherwise defend, **after proof of service on OCTOBER 6, 2017 (UPS INTERNATIONAL CONFIRMED SERVICE OF PLEADINGS WERE RECEIVED BY THE MINISTRY OF JUSTICE IN BRASILIA, BRAZIL).** See, **EXHIBIT A.** (Notice of removal shall be filed within 30 days after defendants receive an **initial pleading - complaint.** See, 28 USC 1446(b)) Also, Judge Pan's ORDER on April 8, 2019 and May 15, 2019 granted Plaintiff's "Motion Requesting Entry of Default". See, Super.Ct.Civ.R. 55(b)(2), **an Ex Parte Proof Hearing on Damages,** that raises a question of **SUBJECT MATTER JURISDICTION.** See, **LOCKHART vs. CADE, 728 A.2d 65 (District of Columbia Court of Appeals, March 4, 1999)**("entry of default 'operates as an admission by the defaulting party that there are no issues of liability, but leaves the issue of damages unresolved until entry of judgment'") **Plaintiff Lambros has no further obligation to prove Liability.** See, **EXHIBIT B.** and **EXHIBIT C.**

In support of this request plaintiff relies upon the record in this case and the following facts that are submitted in affidavit form herein.

In support of this request, I state the following as true and correct pursuant to Title 28 USC 1746.

**FACTS:**

1. I John Gregory Lambros am the **pro se** Plaintiff in the above-entitled matter and I am familiar with the file, records and pleadings in this matter.

2. **November 5, 2018:** Celeste Ingalls, Director of Operations, Crowe Foreign Services, wrote the Honorable Florence Y. Pan, Superior Court of the District of Columbia, Civil Division regarding this action - LAMBROS vs. FEDERATIVE REPUBLIC OF BRAZIL, et al., Superior Court of D.C., Case No. 2017-CA-929-B, outlining the process followed, procedures performed to date and current status of the services requested upon the Federative Republic of Brazil and the State of Rio de Janeiro in Brazil in accordance with the Inter-American Convention. See, **EXHIBIT A.** (This Document states the complaint was shipped to defendants on August 18, 2017 and received on October 6, 2017)

3. **January 16, 2019:** Celeste Ingalls, Director of Operations, Crowe Foreign Services, wrote the Honorable Florence Y. Pan, Superior Court of the District of Columbia, Civil Division regarding this action - LAMBROS vs. FEDERATIVE REPUBLIC OF BRAZIL, et al., Superior Court of D.C., Case No. 2017-CA-929-B, outlining her receipt of thousands of pages of return documents from the Defendants on **JANUARY 11, 2019**, which included copy of what was served, representing the completion of the services requested upon the defendants in accordance with Title 28 USC 1608(a)(2). **"The main point of all these Documents is that Republic of Brazil and State of Rio de Janeiro received Mr. Lambros' complaint and attachments, read and reviewed all, and are refusing to recognize the Court's jurisdiction on the grounds of immunity."** See. **EXHIBIT D.**

4. **January 25, 2019:** **ORDER** by the Honorable Florence Y. Pan, Superior Court of the District of Columbia, Civil Division regarding this action - LAMBROS vs. FEDERATIVE REPUBLIC OF BRAZIL, et al., Superior Court of D.C., Case No. 2017-CA-929-B, requesting Ms. Ingalls, Director of Operations, Crowe Foreign Services, appear by phone at the February 8, 2019, status hearing in Courtroom 415, to explain to the court how she knows that defendants were served in this action. See, **EXHIBIT E.**

5. **April 8, 2019:** The Honorable Judge F. Pan issued an **ORDER** stating that:
- A. Plaintiff's Motion Requesting Entry of Default is GRANTED.
  - B. The default is entered against both defendants.
  - C. The status hearing scheduled for April 26, 2019, is vacated.
  - D. That the parties appear for a status hearing on Friday, July 5, 2019, at 10:30 a.m. in Courtroom 415. **This hearing may be converted to an ex parte proof hearing upon the filing of a motion for default judgment by Plaintiff. See, EXHIBIT B.**
6. **May 15, 2019:** The Honorable Judge F. Pan issued an **ORDER** stating that:
- A. Status hearing scheduled for July 5, 2019, is converted to an **ex parte proof hearing.** **See, EXHIBIT C.**

**DEFENDANTS FILED REMOVAL OF CLAIMS FROM STATE TO FEDERAL COURT**

7. **June 27, 2019:** Defendants pursuant to 28 USC 1441(a) and (d), and 28 USC 1446, filed a "NOTICE OF REMOVAL" in this above action. Please note, 28 USC 1446(b)(1) states NOTICE OF REMOVAL will be filed within 30 days after defendants receive copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based. Defendants received service of process on **OCTOBER 6, 2017 (UPS INTERNATIONAL CONFIRMED SERVICE OF PLEADINGS WERE RECEIVED BY THE MINISTRY OF JUSTICE IN BRASILIA, BRAZIL).** See, **EXHIBIT A.**
8. June 27, 2019: Defendants Attorneys lied, uttering untruths knowingly, as with intent to **deceive this court STATING DEFENDANTS HAVE NEVER BEEN SERVED**

**PROCESS IN THIS ACTION** within the "NOTICE OF REMOVAL", paragraph three (3), stating:

**"Neither of the Sovereign Defendants has been served process** pursuant To 28 USC 1608(a), the exclusive means of serving a foreign state. Accordingly, there are no copies "of all process, pleadings, and orders Served upon" the Sovereign Defendants to file as required by 28 USC 1446(a). For the Court's convenience, as Exhibit A the Sovereign Defendants attach Documents filed with the Superior Court and a copy of the Superior Court Docket Sheet." (Emphasis added)

9. It is clear that the attached Exhibits A thru E were available to Attorney's Clara E. Brillembourg, Janis H. Brennan, Nicholas M. Renzler, and Andrew B. Loewenstein that Represent the law firm FOLEY HOAG LLP and are the attorneys for the Defendants in this action.

10. Plaintiff requests this Court to consider **SANCTIONS** against all of the above attorney's representing the Defendants in this action.

11. Plaintiff also requests this court to note that copy of the June 27, 2019 "NOTICE OF REMOVAL" was filed within the Superior Court of the District of Columbia, Civil Division by Attorney Nicholas M. Renzler, Foley Hoag LLP on June 27, 2019, in an attempt to **obstruct justice** as to Defendant's **admission of liability and prevent Plaintiff Lambros from receiving damage awards on July 5, 2019.** **SUBJECT MATTER JURISDICTION QUESTION, AS THE SUPERIOR COURT ENTERED DEFAULT AGAINST DEFENDANTS ON APRIL 8, 2019, AND ORDERED AN "Ex Parte Proof Hearing" (Damage Hearing) ON MAY 15, 2019. See, LOCKHART vs. CADE, 728 A.2d 65 (District of Columbia Court of Appeals, March 4, 1999)("entry of default 'operates as an admission by the defaulting party that there are no issues of liability, but leaves the issue of damages unresolved until entry of judgment'" ) **Plaintiff Lambros has no further obligation to prove Liability.****

## **STANDARD OF REVIEW:**

12. A civil action filed in state court may only be removed to a United States district court if the case could originally have been brought in federal court. 28 U.S.C. § 1441(a). Upon a motion to remand a removed case to state court, the party opposing the motion "bears the burden of establishing that subject matter jurisdiction exists in federal court." RWN Dev. Grp., LLC v. Travelers Indem. Co., 540 F.Supp.2d 83, 86 (D.D.C.2008) (quoting Int'l Union of Bricklayers & Allied Craftworkers v. Ins. Co. of the West, 366 F.Supp.2d 33, 36 (D.D.C.2005)). Courts are to construe the removal statute narrowly in order to avoid federalism concerns, Shamrock Oil & Gas Corp. v. Sheets, 313 U.S. 100, 108, 61 S.Ct. 868, 85 L.Ed. 1214 (1941), and any doubts about the existence of subject matter jurisdiction are to be resolved in favor of remand. Hood v. E. Hoffman-La Roche, Ltd., 639 F.Supp.2d 25, 28 (D.D.C.2009) (citing Gasch v. Hartford Accident & Indem. Co., 491 F.3d 278, 281-82 (5th Cir. 2007)).

## **COURTS DO NOT AUTOMATICALLY ACCEPT EVERY REQUEST FOR REMOVAL TO TRY A FSIA CASE IN FEDERAL COURT:**

13. This Court has discretion over whether to allow removal after the 30-day time limit for removal requests set forth in 28 USC 1446(b). Factors other courts have considered in that regard, applying a simple "cause shown" standard, include:

- A. **the danger of prejudice to the nonmoving party;**
- B. **the length of a delay and its potential impact on the court;**
- C. **the reason for a delay;**
- D. **whether the movant acted in good faith;**
- E. **the purpose of the removal statute; and**

F. **the extent of concurrent proceedings in state court.**

14. In this action, Plaintiff served Defendants on October 6, 2017, via UPS International. See, EXHIBIT A, Paragraphs 2 and 3. Therefore, Defendants waited Twenty-one (21) months after receiving copy of the initial pleading setting forth the claims for relief, before filing Notice of Removal on June 27, 2019. This is 20 months more than 28 USC 1446(b) allows.

15. Plaintiff Lambros must admit that the actions of the Defendants can only be the work of a person trying to stay this process to **avoid damages**, as this court **must** apply the law of the state to Plaintiff Lambros' complaint, as to the following issues:

- A. Unlawful Trade Practices, D.C. Consumer Protection Act ("DCCPPA"), codified under D.C. Code 28-3901 et seq. See, Complaint pages 26 thru 34.
- B. Torts. See, Complaint pages 34 thru 80.
- C. Declaratory Judgment. See, Complaint pages 80-85.
- D. RICO. See, Complaint pages 85 thru 125.
- E. Medical Monitoring Damages due to torture., etc. See, Complaint page 130, Paragraph 485.
- F. Injunctive Relief. See, Complaint pages 130 thru 131.

See, Erie Railroad Co. vs. Tompkins, 304 US 64, 78 (1938)("Except in matters governed by the Federal Constitution or by acts of Congress, the law to be applied in any case is the **law of the state.**")

**DIVERSITY JURISDICTION - SUBJECT MATTER JURISDICTION:**

16. Again, this Plaintiff believes this court **DOES NOT** have jurisdiction, as the Superior Court entered **DEFAULT AGAINST DEFENDANTS ON APRIL 8, 2019, AND**

**ORDERED AN "Ex Parte Proof Hearing" (Damage Hearing) ON MAY 15, 2019. See, LOCKHART vs. CADE, 728 A.2d 65 (District of Columbia Court of Appeals, March 4, 1999)("entry of default 'operates as an admission by the defaulting party that there are no issues of liability, but leaves the issue of damages unresolved until entry of judgment'" ) Plaintiff Lambros has no further obligation to prove Liability.**

17. Plaintiff Lambros has been proclaimed the winner of the "**CHICKEN DINNER**" by the **District of Columbia Court of Appeals [Lockhard vs. Cade]** and this Court wants to deny me the right to damages - Plaintiff Lambros fails to understand the legal reasoning behind this action?

**CONCLUSION and RELIEF REQUESTED:**

18. Plaintiff Lambros requests this Court to grant his Motion to Remand this action back to the Superior Court of the District of Columbia and direct the clerk to return this Case to the Superior Court of the District of Columbia.

19. **APPOINTMENT OF COUNSEL:** Plaintiff requests this Court to appoint counsel to Plaintiff Lambros, as he currently is living on a total income of \$1,123.00 a month including social security of \$868 and other income of \$255 a month. Plaintiff receives SNAP assistance plus Medical Assistance from the State. Also, Plaintiff believes he has presented a novel issue of first impression to this court regarding subject matter jurisdiction outlined within paragraph 16 above. Briefing of this issue would assist this Court. Again, Plaintiff was incarcerated for 27 years and only released from the halfway house on August 1, 1018.

20.. I JOHN GREGORY LAMBROS states the above information is true and correct under the penalty of perjury, as per Title 28 USC 1746.



EXECUTED ON: July 5, 2019

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John Gregory Lambros, Pro Se

[www.Lambros.Name](http://www.Lambros.Name)

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Gary A. Crowe  
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Celeste Ingalls  
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November 5, 2018

## SENT VIA US MAIL

Honorable Florence Y. Pan  
Superior Court of the District of Columbia, Civil Division  
500 Indiana Avenue, N.W.  
Washington, DC 20001

RE: JOHN GREGORY LAMBROS Vs. FEDERATIVE REPUBLIC OF BRAZIL, et. al.  
Superior Court of D.C. Case No. 2017-CA-929-B

Dear Judge Pan:

At the request of John Gregory Lambros, I have outlined below the process followed, procedures performed to date, and current status of the services requested upon the Federative Republic of Brazil and the State of Rio de Janeiro in Brazil in accordance with the Inter-American Convention:

1. All documents to be served in the above case are required to comply with the Foreign Sovereign Immunities Act, which in Brazil means service in accordance with the Inter-American Convention.
- 2. On August 18, 2017, all documents in the above case, with the requisite Inter-American Convention documents and Portuguese translations of all, were forwarded to the designated Brazil Ministry of Justice (Central Authority for Brazil) for service upon the Federative Republic of Brazil and the State of Rio de Janeiro in accordance with the Inter-American Convention.
- 3. UPS International has confirmed that the above documents were received by the Ministry of Justice in Brasilia, Brazil on October 6, 2017.
4. According to the current Brazilian court docket (obtained from the Brazilian court today, November 8, 2018), it *appears* as though all Brazilian court processes have been completed (attached is a copy of the Brazilian court docket reports for each service). We are now simply waiting for the Brazilian court to return the proof paperwork. This is returned in the form of a bound "book", containing dozens of pages of what occurred within the Brazilian court process. Unfortunately, this will be in Portuguese and we have no way of knowing exactly when it will be returned.

Please feel free to contact me directly regarding any questions you have in this matter.

Very truly yours,



Celeste Ingalls  
Director of Operations  
Crowe Foreign Services

EXHIBIT A

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

JOHN GREGORY LAMBROS : Case Number: 2017 CA 929 B  
v. : Judge: Florence Y. Pan  
FEDERATIVE REPUBLIC OF BRAZIL, *et al.* : Next Hearing: July 5, 2019

**ORDER**

This matter comes before the Court upon the Motion Requesting Entry of Default, filed by plaintiff on March 18, 2019. Plaintiff filed his complaint on February 10, 2017. Plaintiff availed himself of the services of Crowe Foreign Services to effectuate service on defendants. Based on the documentation received by the Court from Crowe Foreign Services on November 14, 2018, January 18, 2019, and February 8, 2019, along with the representations made in court on February 8, 2019, by Crowe Foreign Services' director of operations, Celeste Ingalls, the Court finds that defendants were properly served. On March 18, 2019, plaintiff filed an amended certificate of service that states that he has served the instant motion on defendants by mailing it to the Ministry of Justice in Brasilia. Defendants have not filed a responsive pleading to the complaint nor have they filed an opposition to the instant motion. The Court therefore enters a default against defendants. *See* D.C. Super. Ct. Civ. R. 55(a) ("When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, the clerk or the court must enter the party's default."). Accordingly, this 8<sup>th</sup> day of April, 2019, it is hereby

**ORDERED** that the Motion Requesting Entry of Default is **GRANTED**; and it is further

**ORDERED** that default is entered against both defendants; and it is further

**ORDERED** that the status hearing scheduled for April 26, 2019, is vacated; and it is

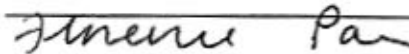
further

**EXHIBIT B.**

11.

**ORDERED** that the parties appear for a status hearing on Friday, July 5, 2019, at 10:30 a.m. in Courtroom 415. This hearing may be converted to an *ex parte* proof hearing upon the filing of a motion for default judgment by plaintiff.

**SO ORDERED.**



Judge Florence Y. Pan  
Superior Court of the District of Columbia

Copies to:

John Gregory Lambros  
1759 Van Buren Avenue  
Saint Paul, MN 55104

Federative Republic of Brazil  
c/o Ministerio da Justica  
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Brazil

State of Rio Janeiro  
Federative Republic of Brazil  
c/o Ministerio da Justica  
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Brazil

EXHIBIT B

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

JOHN GREGORY LAMBROS : Case Number: 2017 CA 929 B  
v. : Judge: Florence Y. Pan  
FEDERATIVE REPUBLIC OF BRAZIL, *et al.* : *Ex Parte* Proof Hearing: July 5, 2019

**ORDER**

This matter comes before the Court upon consideration of plaintiff's Motion for Entry of Default Judgment, filed on May 13, 2019. Plaintiff filed his complaint against defendants on February 10, 2017. The Court issued an order on April 8, 2019, ruling that defendants were properly served with process. Defendants have not filed responsive pleadings to the complaint. On April 8, 2019, the Court entered defaults against defendants.

As to plaintiff's request that an attorney be appointed, there is no right to appointment of counsel in civil cases. *See e.g., Cloutterbuck v. Cloutterbuck*, 556 A.2d 1082, 1084 (D.C. 1989) (explaining that the 6<sup>th</sup> Amendment right to counsel, bolstered by the Criminal Justice Act, is "confined to criminal proceedings"); *Williams v. Court Services & Offender Supervision Agency for D.C.*, 878 F.Supp.2d 263, 266 (D.D.C. 2012) (quoting *Brown v. Children's Nat'l Med. Ctr.*, 773 F.Supp.2d 125, 140 (D.D.C. 2011) ("no indigent civil litigant is guaranteed counsel"). Moreover, the Court does not have the resources to appoint attorneys to represent civil litigants.

Accordingly, this 15<sup>th</sup> day of May, 2019, it is hereby

**ORDERED** that the status hearing scheduled for July 5, 2019, is converted to an *ex parte* proof hearing; and it is further

**EXHIBIT C.**

**ORDERED** that plaintiff's request for appointment of counsel is denied.

**SO ORDERED.**

*Florence Pan*

Judge Florence Y. Pan  
Superior Court of the District of Columbia

Copies to:

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EXHIBIT C.

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Gary A. Crowe  
President

Celeste Ingalls  
Director of Operations  
[celeste@foreignservices.com](mailto:celeste@foreignservices.com)

January 16, 2019

Honorable Florence Y. Pan  
Superior Court of the District of Columbia, Civil Division  
500 Indiana Avenue, N.W.  
Washington, DC 20001

**SENT VIA US PRIORITY MAIL**

RE: JOHN GREGORY LAMBROS Vs. FEDERATIVE REPUBLIC OF BRAZIL, et. al.  
Superior Court of D.C. Case No. 2017-CA-929-B

Dear Judge Pan:

At the request of John Gregory Lambros, I have outlined below the current status of the services in the above entitled action in Brazil in accordance with the Inter-American Convention and the Foreign Sovereign Immunities Act.

On January 11, 2019, I received thousands of pages of return documents from the Brazilian courts (which includes a copy of what was served, etc.) representing the completion of the services requested upon the 2 foreign sovereign defendants in accordance with Title 28 U.S.C. §1608 (a)(2). We call these the "proof books" because they are so large. The procedural practice of the Brazilian courts is that any person that touches the documents and forwards them on to the next step in the 12 month Brazilian court process, must complete a formal signed document and all are included in the documents returned because there isn't one independent page or documents representing the "proof of service". The entire "book" is considered the proof of service because unless all steps are followed, service was not properly performed.

That being said, the documents appear to have been served to the appropriate defendant entities but after completely reviewing them, they returned them with various other documents (such as the original extradition request issued by the federal government while Mr. Lambros was in prison in Brazil).

Attached are the "pertinent" pages of the volumes that represent the final decisions of the Brazilian government, the Rio de Janeiro government and the Brazilian courts. These are of course in Portuguese. The main point of all these documents is that Republic of Brazil and City of Rio de Janeiro received Mr. Lambros' complaint and attachments, read and reviewed all, and are refusing to recognize the court's jurisdiction on the grounds of immunity.

If you have any questions, please let me know.

Very truly yours,



Celeste Ingalls

**EXHIBIT D.**

15.

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

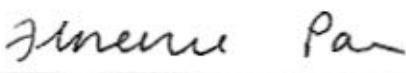
JOHN GREGORY LAMBROS : Case Number: 2017 CA 929 B  
v. : Judge: Florence Y. Pan  
FEDERATIVE REPUBLIC : Next Hearing: February 8, 2019  
OF BRAZIL, *et al.* :

**ORDER**

On January 18, 2019, the Court received by mail documents from Celeste Ingalls, director of operations at Crowe Foreign Services. Ms. Ingalls, in a letter attached to the documents, asserts that she has provided "pertinent" pages that show that defendants were properly served with plaintiff's complaint. The Court is unable to assess this because the documents are in Portuguese, and Ms. Ingalls does not explain in her letter how she knows that defendants were served. Accordingly, it is hereby requested that Ms. Ingalls appear by phone at the February 8, 2019, status hearing by contacting Courtroom 415 at 202-879-1013, promptly at 11:00 a.m. EST on that date.

**SO ORDERED.**

January 25, 2019

  
\_\_\_\_\_  
Judge Florence Y. Pan  
Superior Court of the District of Columbia

Copies to:

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Crowe Foreign Services  
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**EXHIBIT E.**