

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

McGEORGE CAMPING CENTER, INC.,)
)
 Plaintiff,)
)
 v.) Civil Action No. 3:08-cv-0038
)
 AFFINITY GROUP, INC., et al.,)
)
 Defendants.)

**PLAINTIFF McGEORGE CAMPING CENTER, INC.’S
OBJECTION TO REMOVAL AND MOTION TO REMAND**

Plaintiff, McGeorge Camping Center, Inc. (“McGeorge”), by counsel and pursuant to 28 U.S.C. § 1447(c) and Local Rule 7(A), hereby files its objection to the Notice of Removal filed by Affinity Group, Inc. (“AGI”). For the reasons stated in the Memorandum in Support filed herewith, McGeorge Camping Center, Inc. respectfully requests that this Court remand this case to the Circuit Court of the County of Hanover, Virginia, award it its attorneys’ fees, costs, and expenses in accordance with 28 U.S.C. § 1447(c) incurred as a result of AGI’s improper removal, and grant such other and further relief as this Court deems appropriate.

McGeorge respectfully requests to be heard on oral argument on its objection and motion to remand.

McGEORGE CAMPING CENTER, INC.

/s/ Vernon E. Inge, Jr.
Counsel

Vernon E. Inge, Jr. (Va. Bar No. 32699)
Robert Wm. Best (Va. Bar No. 72077)
LECLAIRRYAN, A PROFESSIONAL CORPORATION
Federal Reserve Bank Building, 16th Floor
701 E. Byrd Street
Post Office Box 2499
Richmond, Virginia 23218-2499
Telephone: 804.343.4095
Facsimile: 804.545.1501
E-mail: vernon.inge@leclairyan.com

Counsel for Plaintiff, McGeorge Camping Center, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of February 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

John B. O’Keefe, Esq.
Levine Sullivan Koch & Schulz, L.L.P.
1050 Seventeenth Street, N.W., Suite 800
Washington, DC 20036-1100
E-mail: jokeefe@lskslaw.com
Counsel for Defendant Affinity Group, Inc.

Alexander S. de Witt, Esq.
Theodore I. Brenner, Esq.
BRENNER, EVANS & MILLMAN, P.C.
P.O. Box 470
Richmond, Virginia 23218-0740
E-mail: adewitt@beylaw.com
E-mail: tbrenner@beylaw.com
Counsel for James Hurdle

And I hereby certify that I will mail the document by U.S. Mail to the following non-filing user:

Mr. Jason Duncan
1000 Tasker Lane
Arnold, Maryland 21012

/s/ Vernon E. Inge, Jr.
Counsel

Vernon E. Inge, Jr. (Va. Bar No. 32699)
Robert Wm. Best (Va. Bar No. 72077)
LECLAIRRYAN, A PROFESSIONAL CORPORATION
Federal Reserve Bank Building, 16th Floor
701 E. Byrd Street
Post Office Box 2499
Richmond, Virginia 23218-2499
Telephone: 804.343.4095
Facsimile: 804.545.1501
E-mail: vernon.inge@leclairryan.com