

EXHIBIT 7

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Re: *REQUEST FOR VOLUNTARY WITHDRAWAL OF REMOVAL
PETITION
Clark v Planned Parenthood and Dr Aqua-Don Umoren
Circuit Court Case: CV12-1045-Jefferson County, Alabama
Fed Ct. Case: 2:14-CV-01939-SLB-Norther District of Alabama*

Dear Counsel,

We are in receipt of Physicians Laboratory Services, Inc and Dr Rohlfig's petition for removal together with Planned Parenthood and Dr Umoren's consent to removal filed on October 10, 2014.

Just to be clear, I will submit to you that there is no complete Diversity of Citizenship between the Parties at the time of filing the original complaint in 2012; specifically, with respect to Dr Aqua-Don Umoren who holds dual citizenship of Nigeria and United States of America. I take it defense counsel is not aware of Dr Umoren's dual citizenship based on the language in the Exhibit D-Consent which claimed that Dr Umoren was and has always been a citizen of his country of birth, Nigeria. Defendants' information regarding Dr Umoren citizenship in

Exhibit D clearly failed to mention the most pertinent information to this removal petition, that Dr Umoren is a naturalized citizen of the United States. Dr Umoren's immigrant status, being his dual citizenship of Nigeria and United States at all time relevant in this case defeat defendants' petition for removal under federal law. Again at the time of filing and serving the original complaint, Dr Umoren was a citizen of United of America and has remained a citizen of United States of America at all times thereafter.

As citizen of United States and Nigeria, Dr Umoren holds and carries United States Passport together with his Nigeria Passport. In fact, in his overseas travels, Dr Umoren enters the United States with his United States Passport and enters Nigeria with his Nigeria Passport and when he travels from the United States overseas other than Nigeria; Dr Umoren usually presents his United States Passport.

Also at the time of filing this complaint, Dr Umoren was domiciled in the State of Alabama. Whether Dr Umoren has retired to Nigeria and work in the United States is not the question, it does not matter where Dr Umoren chose as his retirement home, the undisputed fact is that from 2008 until after the original complaint was filed, Dr Umoren was domiciled in the state of Alabama. Dr Umoren testified that he left California and returned to Alabama in 2008 to take up the Medical Director's position with defendants, Planned Parenthood. The records also show that Dr Umoren worked in various abortion clinics from 2008 until after Plaintiff's complaint was filed in 2012. Additionally, applications for two bankruptcy petitions filed by Dr Umoren, chapter 7 (case #02-7393935-CMS7 and chapter 13 case #04-70049-CMS13) filed in 2002 and 2004 will shed light on Dr Umoren's domiciliary in Alabama and his immigrant status. Dr Umoren was personally served with the original summons and complaint in Huntsville Alabama in 2012, although he tried without success to deny the fact that he was personally served with summons and complaint on his job at the Women's Center in Huntsville Alabama.

At any rate, the test for Diversity for purposes of Federal Court Jurisdiction is clear with respect to individuals holding dual citizenships. The courts have consistently held that when an American citizen is also a citizen of another country, only the American Nationality of the dual citizen should be recognized under 28 U.S.C. section, 1332(a) of Federal Court Jurisdiction. Dual citizenship does not create alienage jurisdiction. *Sadat v Merts*, 615 F.2d 1176, 1187 (7th Cir. 1980); *Von Dunser v Aronoff*, 915 F.2d 1071 (6th Cir. 1990). Unless Dr Umoren can show to the court that he has effectively renounced his U.S. citizenship with a proof of his immigrant status as an immigrant worker with a work visa, not as a United States citizen or a permanent resident of the United States, there is no basis of federal jurisdiction.

Therefore, to avoid having to file a motion to remand. I am asking that defendants voluntarily withdraw or dismiss the removal petition by Friday,

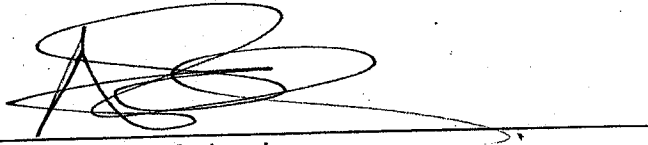
October 17, 2014. I hope Dr Umoren will come clean on his immigrant status, otherwise, we will be forced to get the Department of Homeland Security-INS-Immigration and Naturalization Services involved to ascertain Dr Umoren's immigrant status or citizenship for purposes of Federal Jurisdiction.

Also, we will seek attorneys fees if we are forced to file a motion to remand which we are confident will turn out in our favor.

We look forward to hearing from you.

Sincerely,

BENDER AND AGBOOLA, LLC

A handwritten signature in black ink, appearing to be 'Adedapo T. Agboola', written over a horizontal line.

Adedapo T. Agboola

ATA/baw