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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

GOODIAN & SON, INC. a Montana Corporation, and JAG FARMS, INC., a Montana Corporation,

Plaintiffs,

v.

CORTEVA, INC., CORTEVA AGRISCIENCE, DOW AGROSCIENCES, The DOW CHEMICAL COMPANY, DOWDUPONT, INC., and DOE DEFENDANTS 1-20,

Defendants.

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No. CV-21-51-GF-BMM-JTJ

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**NOTICE OF REMOVAL**

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COMES NOW defendant Corteva Agriscience and for its notice of removal

alleges as follows:

1. This action was commenced in the Montana Twelfth Judicial District Court,

Hill County, on or about March 1<sup>st</sup>, 2021, and defendant Corteva

Agriscience was served on or about April 13<sup>th</sup>, 2021. Based on the facts alleged in plaintiff's complaint, the amount in controversy in this matter exceeds \$75,000. A copy of all processes and pleadings from the Montana Twelfth Judicial District Court, Hill County, served upon or provided to Corteva Agriscience are attached.

2. Based on the allegation in the complaint, plaintiffs Goodian & Son, Inc. and JAG Farms, Inc. are Montana Corporations with their principal place of business in Hill County, Montana.
3. Defendant Corteva, Inc. was incorporated in the state of Delaware and has its principal place of business in the state of Delaware.
4. Corteva Agriscience was incorporated in the state of Delaware and has its principal place of business in the state of Indiana.
5. DowAgrosciences was incorporated in the state of Delaware and had its principal place of business in the state of Indiana.
6. The Dow Chemical Company was incorporated in the state of Delaware and has its principal place of business in the state of Michigan.
7. DowDupont, Inc. was incorporated in the state of Delaware and has its principal place of business in the state of Delaware.
8. This action is now pending in the Montana Twelfth Judicial District Court, Hill County, for the recovery of an amount in excess of \$75,000.

9. This action is one in which this court has jurisdiction pursuant to the provisions of 28 U.S.C. § 1332, and it is removable from the state court to this court on demand and pursuant to the provisions of 28 U.S.C. § 1446 and it is an action where the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs: the plaintiffs are incorporated in the state of Montana with their principal place of business in the state of Montana; and, defendants are incorporated under the laws of a state other than Montana and have their principal places of business in states other than Montana, in the states of Delaware, Indiana, and Michigan respectively.

10. Defendants, Corteva, Inc., DowAgrosciences, The Dow Chemical Company, and DowDupont, Inc., who are represented in this action by the undersigned counsel, have consented to removal of this case to this federal court pursuant to 28 USCA § 1446.

Wherefore, the above-named defendants file this notice of removal and request removal of this action to the United States District Court of the District of Montana, Great Falls Division.

DATED this 13th day of May 2021.

s/ Robert M. Carlson  
Corette Black Carlson & Mickelson  
Attorneys for Defendants

## CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May 2021, a copy of the forgoing document was served on the following persons by the following means:

1          CM/ECF Clerk, US District Court

2          Mail/Email

Reid Perkins  
WORDEN THANE P.C.  
321 W. Broadway St., Ste. 300  
Missoula, MT 59802  
[RPerkins@wordenthane.com](mailto:RPerkins@wordenthane.com)

DATED this 13th day of May 2021.

s/ Robert M. Carlson  
Corette Black Carlson & Mickelson  
Attorneys for Defendants