

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

JOSEPH P. KELLY, MANDA L. KELLY, and
CARA L. MERRILL,

Plaintiffs,

v.

ALLAGASH TIMBERLANDS, LP,

Defendant.

DOCKET NO. _____

**DECLARATION OF NOLAN L. REICHL
IN SUPPORT OF NOTICE OF REMOVAL**

I, Nolan L. Reichl, declare under penalties of perjury:

1. I am a member in good standing of the Bar of this Court and an attorney with the law firm of Pierce Atwood LLP, which represents Defendant in this matter. As such, I am actively involved in the handling of this matter and make this declaration upon my personal knowledge. I submit this declaration for the purpose of submitting certain documents in support of the Notice of Removal filed in the above-captioned action.

2. Attached hereto as **Exhibit A** is a copy of the Plaintiffs' Complaint served upon Defendant Allagash Timberlands, LP on February 26, 2026.

3. Attached hereto as **Exhibit B** is a copy of the summary sheet served upon Defendant Allagash Timberlands, LP on February 26, 2026.

4. Attached hereto as **Exhibit C** is a copy of the summons served upon Defendant Allagash Timberlands, LP on February 26, 2026.

5. Attached hereto as **Exhibit D** is a copy of a consented-to motion to extend the deadline to file a responsive pleading until and including April 17, 2026 which I filed on behalf of Allagash Timberlands, LP in the Aroostook Superior Court – Caribou on March 13, 2026.

6. Attached hereto as **Exhibit E** is a copy of a proposed order on the above referenced consent motion which I filed on behalf of Allagash Timberlands, LP in the Aroostook Superior Court – Caribou on March 13, 2026.

7. Attached hereto as **Exhibit F** is a copy of my entry of appearance which I filed on behalf of Allagash Timberlands, LP in the Aroostook Superior Court – Caribou on March 13, 2026.

8. Attached hereto as **Exhibit G** is a copy of the entry of appearance of my colleague, Julia B. MacDonald, which I filed on behalf of Allagash Timberlands, LP in the Aroostook Superior Court – Caribou on March 13, 2026.

9. Attached hereto as **Exhibit H** is a copy of the March 16, 2026, Order of the Aroostook Superior Court - Caribou granting the above-referenced consent motion.

10. As counsel to Defendant, I am not aware of any proceedings that have taken place in the Maine Superior Court other than those reflected by the filings appearing in Exhibits A through H, and thus Exhibits A through H constitute all pleadings, process, and other documents that make up the state court record in this action.

11. I have requested a certified copy of the state court record from the clerk of the Aroostook Superior Court – Caribou and will submit the state court record to this Court upon receipt.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 27, 2026

/s/ Nolan L. Reichl

Nolan L. Reichl

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*Attorney for Defendant Allagash
Timberlands LP*

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

I hereby certify that on March 27, 2026, I electronically filed the foregoing document, via email to the U.S. District Court in Portland, Maine, and served the same, via email and U.S. Mail, postage prepaid, upon counsel for Plaintiff addressed as follows:

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Steve Smith Trial Lawyers
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/s/ Nolan L. Reichl

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*Attorney for Defendant Allagash
Timberlands LP*