

**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 JASON LIMONGELLI IN SUPPORT OF NOTICE OF REMOVAL

I, Jason Limongelli, declare under penalties of perjury:

1. I submit this declaration in support of the Notice of Removal filed by Allagash Timberlands LP in the above-captioned action.

2. I serve as the Vice President of Woodlands for J. D. Irving, Limited, which, as noted below, is one of the partners the owns Defendant Allagash Timberlands LP. In my role as Vice President of Woodlands, I manage and oversee the day-to-day operations of Allagash Timberlands LP. Accordingly, I make this declaration based upon my own personal knowledge, including my review of relevant business records of Allagash Timberlands LP made at or near the time of the events recorded therein, by a person with knowledge of those events or from information transmitted by such a person, kept in the course of Allagash Timberlands LP's regularly conducted business, and which were the regular practice of Allagash Timberlands LP to make. I specifically have personal knowledge of the places of incorporation and principal places of business of Allagash Timberlands LP's partners, as well as the fair market value of the approximately 80 acres of real property at issue in this case.

3. Allagash Timberlands LP is a limited partnership.

4. Allagash Timberlands LP is owned by four partners: J. D. Irving, Limited, Consolidated Rambler Mines Limited, Eagle Lake Timberlands Inc., and Allagash Holdings Limited.

5. J. D. Irving, Limited is a corporation formed under the laws of New Brunswick, Canada, with a principal place of business in New Brunswick, Canada. That is the location from which its executives direct, control, and coordinate the corporation's activities.

6. Consolidated Rambler Mines Limited is a corporation formed under the laws of Ontario, Canada, with a principal place of business in Ontario, Canada. That is the location from which its executives direct, control, and coordinate the corporation's activities.

7. Eagle Lake Timberlands Inc. is a corporation formed under the laws of New Brunswick, Canada, with a principal place of business in New Brunswick, Canada. That is the location from which its executives direct, control, and coordinate the corporation's activities.

8. Allagash Holdings Limited is a corporation formed under the laws of New Brunswick, Canada, with a principal place of business in New Brunswick, Canada. That is the location from which its executives direct, control, and coordinate the corporation's activities.

9. Allagash Timberlands LP is a statewide leader in forestry and land management, and, accordingly, appropriately valuing land holdings is central to our business. Allagash Timberlands values the disputed property, described in Paragraphs 6 and 7 of the Plaintiffs' Complaint as approximately 80 acres, at an amount greater than \$75,000.

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/ Jason Limongelli

Jason Limongelli

**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:

John E. Baldacci, Jr., Esq.
Steve Smith Trial Lawyers
191 Water Street
Augusta, ME 04330
jack@americantrialgroup.com

/s/ Nolan L. Reichl

Nolan L. Reichl
PIERCE ATWOOD LLP
Merrill's Wharf
254 Commercial Street
Portland, ME 04101
Tel: 207.791.1100
nreichl@pierceatwood.com

*Attorney for Defendant Allagash
Timberlands LP*