

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 kkalkowski@kcnvlaw.com
Attorneys for Defendant National
7 *Collegiate Athletic Association*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MICHAEL ANTHONY CRUZ JR.,

Case No.:

11 Plaintiff,

(District Court of Washoe County Nevada
Case No. CV26-02081)

12 vs.

13 NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,

NOTICE OF REMOVAL

14 Defendant.

15 Pursuant to 28 U.S.C. § 1441, Defendant National Collegiate Athletic Association
16 (“NCAA”), through its counsel, Kaempfer Crowell, removes this action to this Federal Court. In
17 support of removal, NCAA states as follows:

18 1. This action was commenced in the Second Judicial District Court, Washoe County,
19 State of Nevada, through a Complaint filed on July 17, 2026, under Case No. CV26-02081.

20 2. Based on current information, NCAA has not been served with process to date.

21 3. This Notice of Removal is filed within thirty days after NCAA’s receipt of the
22 Complaint, in compliance with 28 U.S.C. § 1446(b) and per this Court’s decision in *Coleman v.*
23 *Assurant, Inc.*, 463 F.Supp.2d 1164 (D. Nev. 2006) (providing thirty days for removal after notice
24 or service of each defendant).

1 4. In accord with § 1446(a), a copy of the following are attached: (1) **Ex. A**,
2 Complaint; (2) **Ex. B**, Emergency Motion for Temporary Restraining Order and Preliminary
3 Injunction.

4 5. Removal is appropriate under 28 U.S.C. § 1441(a) because this Court has
5 jurisdiction over this action pursuant to 28 U.S.C. § 1331, which grants district courts original
6 jurisdiction over claims “arising under the Constitution, laws, or treaties of the United States.”
7 Specifically, Plaintiff’s First Claim for Relief is brought under 15 U.S.C. §§ 1, 15, 26, alleging
8 violations of “Section 1 of the Sherman Antitrust Act and Sections 4 and 16 of the Clayton Act.”
9 *See Ex. A*, Complaint.

10 6. This Court has jurisdiction over Plaintiff’s state-law claims in the Complaint
11 through supplemental jurisdiction under 28 U.S.C. § 1367 because the state-law claims arise from
12 the common nucleus of operative facts giving rise to Plaintiff’s federal cause of action.

13 7. Other than NCAA, there are no other defendants and, thus, consent is not required
14 by other defendants before removal can occur.

15 8. Under 28 U.S.C. § 1446(a), the state court in which this action was commenced is
16 within this Court’s jurisdiction.

17 9. Pursuant to 28 U.S.C. § 1446(d), NCAA certifies that a copy of this Notice of
18 Removal will be served promptly on Plaintiff and filed with the Clerk of the Second Judicial
19 District Court, Washoe County, Nevada.

20 DATED this 28th day of July, 2026.

21 KAEMPFER CROWELL

22 By: /s/ Lyssa S. Anderson

23 LYSSA S. ANDERSON (Nevada Bar No. 5781)

24 KRISTOPHER J. KALKOWSKI (Nevada Bar No. 14892)

1980 Festival Plaza Drive, Suite 650

Las Vegas, Nevada 89135

Attorneys for Defendant NCAA

CERTIFICATE OF SERVICE

I certify that I am an employee of KAEMPFER CROWELL, and that on the date below, I caused the foregoing **NOTICE OF REMOVAL** to be served via CM/ECF and/or First Class Mail (where indicated) addressed to the following:

Lucas M. Foletta (Nevada Bar No. 12154)
HOLLAND & HART LLP
5470 Kietzke Lane, Suite 100
Reno, NV 89511-2094
Phone: 775.327.3000
LMFoletta@hollandhart.com

Attorneys for Plaintiff

DATED this 28th day of July 2026.

KAEMPFER CROWELL

By: /s/Robin Callaway