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Attorneys for Defendant

Adam J. Karr Ut. Bar No. (18437)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION**

MICHAEL STECKLING, Plaintiff, TAMIR POLEG, Defendant.	DEFENDANT'S NOTICE OF REMOVAL Case No. 2:25-cv-01062 Judge:
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Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendant Tamir Poleg (“Defendant”), hereby removes this action from the Fourth Judicial District Court in and for Utah County, State of Utah, to the United States District Court for the District of Utah. In support of this Notice of Removal, Defendant avers as follows:

PROCEDURAL HISTORY

1. On October 21, 2025, Plaintiff Michael Steckling (“Plaintiff”) filed his initial complaint in the Fourth Judicial District Court for the County of Utah, styled and captioned as above. The matter was given Case No. 250405264 and is currently assigned to Judge Petersen in the Fourth District Courthouse in Provo. Pursuant to 28 U.S.C. § 1446(a), Exhibit A, attached

hereto, are copies of all process, pleadings, and orders served in the State Court Action.

2. This case is brought as a civil tort action for alienation of affection. Plaintiff makes claims for compensatory and punitive damages.

3. Defendant accepted service of the Complaint on October 29, 2025. Other than the documents attached as Exhibit A, no other process, pleadings, or orders have been filed or served in this action.

4. This Notice of Removal has been filed within 30 days of service of Complaint upon Defendant. The requirement of 28 U.S.C. § 1446(b) that removal occur within 30 days of service of the Complaint therefore has been satisfied.

BASIS FOR REMOVAL

5. Defendant submits that this Court has subject matter jurisdiction over the claim alleged because all parties have diverse citizenship. Under 28 U.S.C. § 1332(a)(2), diversity of citizenship jurisdiction exists where the matter in controversy exceeds the sum or value of \$75,000 and is “between citizens of a State and citizens or subjects of a foreign state.”

6. A party’s citizenship for diversity jurisdiction purposes is determined by their domicile, which turns on their physical presence in the state and intent to remain there indefinitely. Plaintiff is domiciled in Utah County and is a citizen of Utah for diversity jurisdiction purposes. (*See Compl. ¶ 1.*) Defendant is a lawful citizen of a foreign nation, Israel, and is domiciled there.

7. The amount in controversy exceeds \$75,000 as Plaintiff’s Complaint was filed as a Tier 3 action pursuant to Utah Rule of Civil Procedure 26(c)(3), seeking damages in excess of

\$300,000.00.

8. Here, the Court has diversity jurisdiction pursuant to 28 U.S.C. § 1332(a)(2) based on the complete diversity of citizenship between the parties involved.

VENUE

9. Plaintiff's State Court Action was commenced in the Fourth Judicial District Court for the County of Utah and, pursuant to 28 U.S.C. §§ 125, 1446(a-c), may be removed to this United States District Court for the District of Utah, Central Division, which embraces the County of Utah within its jurisdiction.

PROCEDURAL REQUIREMENTS.

10. Defendant satisfies the procedural requirements for removal.

11. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders filed in the State Court Action are attached hereto as Exhibit A.

12. Pursuant to 28 U.S.C. § 1446(b)(1), (c), this Notice of Removal is timely because it was filed within thirty (30) days of service of the Complaint on Defendant.

13. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal will be served upon all parties and a copy filed with the Clerk of Court for Department of the Fourth Judicial District Court for the County of Utah.

14. Pursuant to 28 U.S.C. § 1446(d), a copy of the written notice to be filed in the Fourth Judicial District Court in and for Utah County, State of Utah, is attached as Exhibit B. A copy of this notice has also been provided to Plaintiff.

CONCLUSION

15. For the reasons started herein, pursuant to 28 U.S.C. § §§ 1332, 1441 and 1446, the State Court Action may be removed to U.S. District Court, and Defendant respectfully requests that it be so removed.

WHEREFORE, Tamir Poleg respectfully gives notice of and removes this action to this Court.

DATED this 20th day of November, 2025.

RAY QUINNEY & NEBEKER P.C.

/s/ Matthew N. Evans

Matthew N. Evans

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 21th day of November, 2025, I caused to be electronically filed the foregoing **DEFENDANT'S NOTICE OF REMOVAL** with the Clerk of Court using the CM/ECF system. I hereby certify that I served opposing counsel the foregoing via email:

PARSONS BEHLE & LATIMER
Erik A. Christiansen
EChristiansen@parsonsbehle.com
Attorney for Plaintiff

/s/ Janae Kidd

1727454

EXHIBIT A

FOURTH JUDICIAL DISTRICT - PROVO DISTRICT COURT
UTAH COUNTY, STATE OF UTAH

MICHAEL STECKLING vs. TAMIR POLEG

CASE NUMBER 250405264 Intentional Tort

CURRENT ASSIGNED JUDGE

SEAN PETERSEN

PARTIES

Plaintiff - MICHAEL STECKLING
Represented by: ERIK CHRISTIANSEN

Defendant - TAMIR POLEG
Represented by: MATTHEW EVANS

ACCOUNT SUMMARY

Total Revenue Amount Due:	625.00
Amount Paid:	625.00
Amount Credit:	0.00
Balance:	0.00

REVENUE DETAIL - TYPE: COMPLAINT - NO AMT S

Amount Due:	375.00
Amount Paid:	375.00
Amount Credit:	0.00
Balance:	0.00

REVENUE DETAIL - TYPE: JURY DEMAND - CIVIL

Amount Due:	250.00
Amount Paid:	250.00
Amount Credit:	0.00
Balance:	0.00

CASE NOTE

PROCEEDINGS

10-21-2025 Case filed by efiler
10-21-2025 Judge SEAN PETERSEN assigned.
10-21-2025 Filed: Complaint
10-21-2025 Fee Account created Total Due: 375.00
10-21-2025 Fee Account created Total Due: 250.00
10-21-2025 COMPLAINT - NO AMT S Payment Received: 375.00
10-21-2025 JURY DEMAND - CIVIL Payment Received: 250.00
10-21-2025 Filed: Return of Electronic Notification
10-29-2025 Filed return: Acceptance of Service of the Summons and
Complaint upon VIA COUNSEL ADAM KARR for
Party Served: TAMIR POLEG
Service Type: Personal

Service Date: October 29, 2025

Garnishee:

10-29-2025 Filed: Return of Electronic Notification
11-13-2025 Filed: Appearance of Counsel/Notice of Limited Appearance of
Matthew N. Evans
11-13-2025 Filed: Return of Electronic Notification

Erik A. Christiansen, USB 7372
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EChristiansen@parsonsbehle.com

Attorney for Plaintiff Michael Steckling

IN THE FOURTH JUDICIAL DISTRICT COURT
FOR THE COUNTY OF UTAH, STATE OF UTAH

Michael Steckling,

Plaintiff,

vs.

Tamir Poleg,

Defendant.

COMPLAINT

Civil No.

TIER 3

Comes now, Plaintiff Michael Steckling (“Michael” or “Plaintiff”) and alleges against Defendant Tamir Poleg (“Poleg” or “Defendant”) as follows:

PARTIES, JURISIDICTION, AND VENUE

1. Michael Steckling is an individual residing in Utah County, State of Utah.
2. Tamir Poleg is an individual who, on information and belief, resides in Manhattan, State of New York or Israel.
3. This Court has jurisdiction over this matter pursuant to Utah Code § 78A-5-102 because this Court has original jurisdiction in all civil matters.

4. This Court has personal jurisdiction over the Defendant consistent with Utah Code § 78B-3-205(3) because he committed the tortious acts giving rise to this Complaint in the State of Utah.

5. Venue is proper in this Court pursuant to Utah Code § 78B-3a-201 because the tortious acts giving rise to this Complaint occurred in Utah County, State of Utah.

6. Plaintiff files this Complaint as a Tier 3 action pursuant to Utah Rule of Civil Procedure 26(c)(3), as he seeks damages in excess of \$300,000.00.

GENERAL ALLEGATIONS

7. Plaintiff married his wife, Paige Steckling (“Paige”), on September 2, 2013.

8. Plaintiff and Paige have two children together, ages nine and six at the time of the filing of this Complaint.

9. On information and belief, Defendant was at all relevant times married to Marina Poleg.

10. Defendant is the CEO and Director of Real Brokerage Inc., a publicly traded corporation currently worth upwards of \$886 million.

11. In or around January of 2025, Defendant offered Paige upwards of \$500,000.00 and a home in Park City, Utah worth \$2,000,000.00 to \$3,000,000.00 to take care of her needs in exchange for her ending her marriage with Plaintiff and pursuing a romantic relationship with Defendant.

12. Paige informed Plaintiff about the above-mentioned offer in January of 2025.

13. On or about January 26, 2025, Defendant booked a hotel for he and Paige in Miami, Florida for February 6 to February 10, 2025.

14. On or about February 3, 2025, Defendant via email provided Paige with instructions for accessing \$1.5 million from Defendant, with instructions that the funds could be accessed by Paige for one year.

15. The email indicated that \$800,000.00 would be available immediately and \$700,000.00 would be available in the middle of March 2025.

16. Defendant sold over \$600,000.00 worth of stock in his company, The Real Brokerage, Inc. (REAX), on February 3, 2025, presumably to fund the transaction to Paige.

17. Paige filed for divorce from Plaintiff three days later, on February 6, 2025. (Fourth District Case No. 254400343).

18. Prior to Paige filing for divorce from Plaintiff, Defendant organized at least three meetings with Paige, including Las Vegas, Nevada in October 2024; Park City, Utah in December 2024, and Anaheim, California in January 2025, presumably to persuade Paige to leave her marriage and pursue a romantic relationship with him.

19. Defendant cultivated an inappropriate and financially intimate relationship with Paige, discussing housing purchases and lifestyle upgrades inconsistent with a professional relationship.

20. Prior to Plaintiff's learning of Paige's intent to leave him for Defendant and in exchange for the money being offered to her by Defendant, Plaintiff and Paige were in a loving, happy, and committed marriage.

21. Plaintiff and Paige often traveled together, both with their children and by themselves on couple's trips. In 2024, Plaintiff and Paige traveled to Disney World, Hawaii,

Mexico, and St. George with their children. Plaintiff and Paige also took solo trips to St. George and Park City in 2024.

22. Plaintiff and Paige regularly spent time together outside the home, often attending Utah Jazz games and Utah Utes football games, skiing together, and attending date nights with their friends.

23. Plaintiff and Paige also spent time together in their home, watching TV and movies and otherwise enjoying each other's company.

24. Plaintiff and Paige both worked full time and both invested financially in the future of their family.

25. At the time he made the aforementioned offer to Paige, Defendant knew Paige was in a loving, committed marriage to Plaintiff and that Plaintiff and Paige had two children together.

26. Prior to Defendant making the aforementioned offer to Paige, Plaintiff and Paige had not discussed separation or divorce.

FIRST CAUSE OF ACTION
(Alienation of Affection)

27. Plaintiff realleges and reincorporates the foregoing facts as if fully set forth herein.

28. At the time of the actions in question, Plaintiff and Paige were in a loving and committed marriage, as evidenced by, among other things, the fact that they spent significant time with each other traveling and attending events outside the home and by the fact that they were both investing towards the family's financial future.

29. Defendant knew Paige was married to Plaintiff when he offered her substantial sums of money in exchange for her leaving her marriage to Plaintiff to pursue a relationship with Defendant.

30. Despite knowledge of Plaintiff and Paige's marriage, Defendant intentionally alienated Paige's affections from Plaintiff by inviting her on expensive and luxurious vacations and by offering her a large sum of money in exchange for ending her marriage.

31. Defendant intended that his actions would cause Paige to end her marriage to Plaintiff.

32. Paige filed for divorce from Plaintiff because of Defendant's actions, including his offer of a large sum of money to her.

33. Defendants' actions were thus the controlling cause of the alienation of Paige's affections from Plaintiff.

34. Defendant suffered emotional and financial distress and loss of family stability directly resulting from Defendant's conduct.

35. As a result of Defendant's actions, Plaintiff has been damaged in an amount to be determined at trial, but no less than \$5,000,000.00 for the loss of comfort, society, and consortium of Paige.

36. Given his knowledge of the marriage and his offer of a large sum of money to convince Paige to leave her marriage, Defendant acted in a willful and malicious manner and with a knowing and reckless indifference toward Plaintiff's rights and interest in his marriage to Paige, subjecting Defendant to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

1. Judgment in favor of Plaintiff and against Defendant for the claims in his Complaint;
2. Compensatory damages in an amount to be determined at trial;
3. Punitive damages for Defendant's willful, malicious, and reckless behavior;
4. An award of reasonable attorneys' fees and costs as allowed by law;
5. Pre- and post-judgment interest as allowed by applicable law; and
6. Such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial for all claims set forth in this Complaint or in any subsequent or amended complaints filed in this action.

DATED October 21, 2025.

PARSONS BEHLE & LATIMER

/s/ Erik A. Christiansen

Erik A. Christiansen

Attorney for Plaintiff Michael Steckling

Erik A. Christiansen, USB 7372
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
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EChristiansen@parsonsbehle.com

Attorney for Plaintiff Michael Steckling

IN THE FOURTH JUDICIAL DISTRICT COURT
FOR THE COUNTY OF UTAH, STATE OF UTAH

Michael Steckling,
Plaintiff,
vs.
Tamir Poleg,
Defendant.

ACCEPTANCE OF SERVICE
Civil No. 250405264
Honorable Sean Petersen
TIER 3

Pursuant to Utah Rule of Civil Procedure Rule 4(d)(3)(C), Attorney Adam Karr of the law firm O'Melveny & Myers LLP, on behalf of Defendant Tamir Poleg, hereby acknowledges and accepts service of the SUMMONS AND COMPLAINT filed in the above-captioned action. Counsel agrees that service on this Defendant is complete in all respects as required by Rule 4(b) of the Utah Rules of Civil Procedure and hereby waives any further service of process of the Summons and Complaint. Service is complete as required under Rule 4 as of the date of the return of this Acceptance of Service.

This Acceptance of Service shall constitute good and adequate proof of service as required the aforementioned Rule 4(b). Defendant retains all defenses and objections to the claims asserted in the Complaint, except for adequacy of service.

Acceptance of Service by:

O'MELVENY & MYERS LLP

/s/ Adam Karr *

Adam Karr

(*signed with email permission)

Attorney for Tamir Poleg

Filed by:

PARSONS BEHLE & LATIMER

/s/ Erik A. Christiansen

Erik A. Christiansen

Attorney for Plaintiff Michael Steckling

I caused a true and correct copy of the **ACCEPTANCE OF SERVICE** to be served by electronic mail to all counsel of record, listed below, and this certificate of service to be filed with the Clerk of Court using GreenFiling, which will electronically serve this document on all counsel of record.

Dated: October 29, 2025

PARSONS BEHLE & LATIMER

/s/ Erik A. Christiansen
Erik A. Christiansen

Plaintiff Michael Steckling

Matthew N. Evans (7051)
RAY QUINNEY & NEBEKER P.C.
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Attorneys for Defendant

Adam J. Karr
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Telephone: (213) 430-6516
akarr@omm.com

**IN THE FOURTH DISTRICT COURT
UTAH COUNTY, STATE OF UTAH**

MICHAEL STECKLING,
Plaintiff,
TAMIR POLEG,
Defendant.

NOTICE OF APPEARANCE

Case No.: 250405264

Judge: Sean Petersen

Please take notice that Matthew N. Evans of the law firm Ray Quinney & Nebeker P.C. hereby enters his appearance as counsel for Defendant Tamir Poleg in the above-captioned action.

DATED this 13th day of November, 2025.

RAY QUINNEY & NEBEKER P.C.

/s/*Matthew N. Evans*
Matthew N. Evans

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 2025, I caused to be electronically filed the foregoing **NOTICE OF APPEARANCE** with the Clerk of Court using the CM/ECF system giving notice to counsel of record:

PARSONS BEHLE & LATIMER
Erik A. Christiansen
EChristiansen@parsonsbehle.com
Attorney for Plaintiff

1727147

/s/ Janae Kidd

EXHIBIT B

Matthew N. Evans (7051)
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Attorneys for Defendant

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Los Angeles, California 90071
Telephone: (213) 430-6516
akarr@omm.com

**IN THE FOURTH JUDICIAL DISTRICT COURT
UTAH COUNTY, STATE OF UTAH**

MICHAEL STECKLING,
Plaintiff,
TAMIR POLEG,
Defendant.

DEFENDANT'S NOTICE OF REMOVAL
Case No. 250405264
Judge Sean Peterson

PLEASE TAKE NOTICE that Defendant Tamir Poleg ("Defendant"), by and through undersigned counsel, hereby removes this action from the Fourth Judicial District Court, in and for Utah County, State of Utah, to the United States District Court for the District of Utah, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446. A copy of the Notice of Removal filed by Defendant in the Office of the Clerk of the United States District Court for the District of Utah is attached hereto as Exhibit A. The filing of this Removal Notice shall affect the removal to federal court in accordance with 28 U.S.C. § 1446(d), and all further proceedings in this Court are stayed.

DATED this 20th day of November, 2025.

RAY QUINNEY & NEBEKER P.C.

/s/
Matthew N. Evans

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 2025, I caused to be electronically filed the foregoing **DEFENDANT'S NOTICE OF REMOVAL** with the Clerk of Court using the CM/ECF system giving notice to counsel of record:

PARSONS BEHLE & LATIMER
Erik A. Christiansen
EChristiansen@parsonsbehle.com
Attorney for Plaintiff

/s/ _____

1727825

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 - United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 - Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 - Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 - Original Proceedings. (1) Cases which originate in the United States district courts.
 - Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 - Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 - Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.

PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 - Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 - Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.