

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

**LOUISIANA TECH UNIVERSITY
FOUNDATION, INC.**

V.

BEL-MAC ROOFING, INC.

*** CIVIL ACTION NO. 3:21-03539
*
* JUDGE TERRY A. DOUGHTY
*
* MAGISTRATE JUDGE KAYLA
* D. MCCLUSKY

*** * * * ***

**MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION
AND IMPROPER VENUE OR, ALTERNATIVELY, TO TRANSFER VENUE**

NOW INTO COURT, through undersigned counsel, comes Defendant Bel-Mac Roofing, Inc., which respectfully moves this Court to dismiss this action pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(3), or in the alternative, to transfer venue of this case pursuant to 28 U.S.C. § 1404(a) from the United States District Court for the Western District of Louisiana to the United States District Court for the Northern District of Florida. As explained in the attached memorandum, Bel-Mac moves for a dismissal of Plaintiff’s claims against it because (1) Bel-Mac is not subject to personal jurisdiction in Louisiana; (2) the Western District of Louisiana is not a proper venue; and (3) even if this Court finds that Bel-Mac is subject to personal jurisdiction and that that this Court is a proper venue, the case should nevertheless be transferred to the Northern District of Florida for the convenience of the parties and witnesses and in the interests of justice.

WHEREFORE, Bel-Mac moves this Court for dismissal of Plaintiff's Complaint or, alternatively, for a transfer of venue from the Western District of Louisiana to the Northern District of Florida.

Respectfully submitted,

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