

**IN THE UNITED STATES DISTRICT COURT  
District of Columbia**

JONES DAY,

Plaintiff,

v.

RICHARD M. SCRUSHY,

Defendant.

Case No. 1:06CV00466

Judge: James Robertson

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**RICHARD M. SCRUSHY'S MOTION TO TRANSFER  
FOR LACK OF PERSONAL JURISDICTION AND FOR LACK OF PROPER VENUE**

Defendant Richard M. Scrushy, pursuant to Fed. R. Civ. P. 12(b)(2) and (3) and 28 U.S.C. §§ 1391, 1404 and 1406, through his undersigned counsel, moves to transfer this case to the United States District Court for the Northern District of Alabama because this Court lacks personal jurisdiction and venue is not proper in this Court. In support hereof, this Court is referred to the accompanying Memorandum of Points and Authorities and Declaration of Richard M. Scrushy.

WHEREFORE, Richard M. Scrushy respectfully requests that this Court grant his Motion to Transfer for Lack of Personal Jurisdiction and for Lack of Proper Venue and (i) transfer this action to the United States District Court for the Northern District of Alabama and (ii) grant any further relief deemed just and proper by this Court.

Respectfully submitted,

BEAN, KINNEY & KORMAN, P.C.

By: /s/ James R. Schroll

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2006, a copy of the foregoing and annexed pleading was served by electronic case filing to:

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