

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

**WISSAM ABDULLATEFF SA'EED
AL-QURAIISHI,**

Plaintiff,

v.

ADEL NAKHLA, et al.,

Defendants.

Civil Action No. 8:08-cv-01696-PJM

MOTION OF DEFENDANT L-3 SERVICES, INC. TO TRANSFER VENUE

Defendant L-3 Services, Inc. moves under 28 U.S.C. § 1404(a) to transfer venue to the Eastern District of Virginia. A nearly identical case, filed by plaintiff's counsel in this case, is currently pending in the Eastern District in the exact same procedural posture, i.e., awaiting the filing of motions to dismiss. The cases allege an identical conspiracy among the defendant in this case, the defendants in the Eastern District case, and the military and/or other government agencies, to inflict injuries that the plaintiffs claim to have suffered during their detention by the United States military in Iraq primarily at the Abu Ghraib detention center during the November 2003 to June 2004 period.

These two cases were originally filed as five against all the corporate defendants in five different jurisdictions. The current posture is the result of a series of actions by plaintiffs' counsel that can only be explained as forum and judge shopping. These actions include selectively dismissing cases assigned to judges she preferred to avoid and defendants she wished to separate into different venues. She has treated the plaintiffs and the defendants as interchangeable, dismissing the claims against defendant L-3 Services in the cases in the Eastern District (before eventually dismissing two of the three cases in their entirety), while

adding those plaintiffs and their individual allegations, and over sixty new plaintiffs with no substantive allegations to this now boilerplate complaint from which she has dropped the alleged co-conspirator CACI entities. But the cases are thoroughly intertwined and are essentially identical. Transfer of this case to the Eastern District will clearly conserve judicial, party, and nonparty resources through consolidation; no factors weigh against transfer. Thus, notwithstanding plaintiffs' manipulation to avoid it, which independently supports transfer, the Court should transfer this case to the Eastern District.

Respectfully submitted,

Dated: September 8, 2008

/s/ F. Greg Bowman

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