

IN THE _____ COURT OF THE STATE OF _____

FOR THE COUNTY OF _____

_____,
Plaintiff,

v. Case No. _____

_____,
Defendant.

_____/

MOTION TO CHANGE VENUE

Plaintiff/Defendant, _____ (hereinafter "Movant"), by and through undersigned counsel, respectfully moves this Honorable Court for an Order changing the venue of this action from _____ County, _____, to _____ County, _____, or such other appropriate venue as the Court deems proper, pursuant to _____ [cite relevant statute or rule, e.g., Rule of Civil Procedure _____], and states in support thereof:

I. PROCEDURAL POSTURE

1. This action was commenced by Plaintiff, _____, against Defendant, _____, on or about _____.
2. The complaint alleges _____

3. This Court currently maintains venue in _____ County,
_____.

II. GROUNDS FOR MOTION

4. Movant seeks a change of venue based upon the following grounds:
- The convenience of the parties and witnesses; and
 - The interests of justice, including the potential for bias and the assurance of a fair trial.

III. STATEMENT OF FACTS

5. The incident giving rise to this action occurred in _____ County,
_____, on or about _____.
6. Movant resides in _____ County, _____.
7. Defendant resides in _____ County, _____.
8. The majority of the material witnesses expected to testify in this action reside in
_____ County, _____, or in counties immediately
adjacent thereto. These witnesses include:
- _____
 - _____
 - _____
9. The primary documentary evidence and physical evidence relevant to this case are located in
_____ County, _____, specifically:
- _____
 - _____
10. Public sentiment and media coverage regarding the subject matter of this litigation, or one of
the parties, has been extensive in _____ County, _____,
potentially creating an atmosphere where a fair and impartial jury may be difficult to impanel.
Specifically, _____

_____ .

IV. ARGUMENT

11. Convenience of Parties and Witnesses:

- a. A change of venue to _____ County, _____ , would significantly enhance the convenience of the parties and the majority of the material witnesses.
- b. Requiring these witnesses to travel to _____ County, _____ , would impose an undue burden, including significant travel time, expense, and disruption to their personal and professional lives.
- c. The costs associated with transporting witnesses and evidence to the current venue would be substantial and could be mitigated by transferring the case to _____ County, _____ .
- d. The interests of judicial economy are also served by selecting a venue where the majority of the evidence and witnesses are readily accessible, thereby streamlining the litigation process.

12. Interests of Justice and Fair Trial:

- a. The Movant has a fundamental right to a fair and impartial trial, free from local prejudice or bias.
- b. Due to the significant local interest and media attention surrounding this case and/or the parties involved in _____ County, _____ , there is a substantial risk that Movant cannot receive a fair and impartial trial in the current venue.
- c. The pervasive nature of the local sentiment, as evidenced by _____ , raises legitimate concerns about the ability to select an unbiased jury.
- d. Transferring this action to _____ County, _____ , a jurisdiction less affected by the local issues and publicity, would ensure that the Movant receives a trial by an impartial jury, thereby upholding the integrity of the judicial process.

V. RELIEF REQUESTED

WHEREFORE, Movant respectfully requests that this Honorable Court enter an Order:

- a. Changing the venue of this action from _____ County,
_____, to _____ County,
_____;
- b. Granting such other and further relief as this Court deems just and proper.

Dated this _____ day of _____, 20_____.

Respectfully submitted,

Signature

Printed Name: _____

Bar No.: _____

Attorney for _____

Address: _____

Phone: _____

Email: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION TO CHANGE VENUE was served upon the following counsel of record via _____ [e.g., U.S. Mail, hand delivery, electronic mail] on this _____ day of _____, 20_____:

Name of Opposing Counsel

Attorney for _____

Address:

Email:

Signature