

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

)
)
)
)
Petitioner/Plaintiff,
)
)
Vs.
)
)

Respondent/Defendant)
)
)

NO. _____

MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER

Pursuant to _____. R. Civ. P. ____, _____, files this Motion to Dismiss, Or,
in the Alternative, to Transfer Venue on the basis that venue is improper in the Circuit Court of
_____ County.

I.

The Complaint identifies the Plaintiffs as adult resident citizens of _____ County.
Further, the Complaint represents that _____ is located, with its principal place of
business, at _____, _____. This is correct. Thus,
_____ is domiciled in _____ County. The cause of action involves the
alleged wrongful denial of benefits, which denial would have occurred in _____ County
at the domicile of _____.

Accordingly, pursuant to _____. Code Ann. Section _____, venue is proper in
_____ County, _____.

WHEREFORE, _____ requests this Court to dismiss this action, or, in the
alternative, to transfer this action to the Circuit Court of _____ County on the basis of

improper venue. _____ further requests all additional relief the Court may deem proper.

DATED, this the _____ day of _____, 20____.

Respectfully submitted,

Dated: _____

Name: _____

Title:

Address:

Address:

City, State, Zip:

Phone:

Fax:

E-Mail:

Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed, U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to _____, at the following address;

THIS the _____ day of _____, 20____.