

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, EASTERN DIVISION

R.S. v. Red Roof Inns, Inc., et al.

R.S. v. Red Roof Inns · No. 2:25-cv-0965 · Decided March 4, 2026

SUMMARY

The United States District Court for the Southern District of Ohio denied Defendants’ motion to transfer venue under 28 U.S.C. § 1404(a). The court held that the Southern District of Ohio was a proper forum and that Defendants had not shown that the Eastern District of Virginia was a more convenient venue, consistent with the court’s prior decisions in similar TVPRA cases.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Elizabeth A. Preston Deavers
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	March 4, 2026
DOCKET	2:25-cv-0965
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to transfer venue to the United States District Court for the Eastern District of Virginia under 28 U.S.C. § 1404(a). The district court denied the motion.
STANDARD OF REVIEW	A motion to transfer under 28 U.S.C. § 1404(a) is committed to the sound discretion of the district court. The moving party bears the burden of establishing that transfer is warranted to a more convenient forum, after the court determines that the action could have been brought in the transferee district.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown

TOPICS

- venue
- civil procedure
- civil rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the action should be transferred from the Southern District of Ohio to the Eastern District of Virginia under 28 U.S.C. § 1404(a).
2. Whether the Southern District of Ohio was a proper venue and had personal jurisdiction over the defendants.

HOLDINGS

1. Transfer to the Eastern District of Virginia was not warranted because the defendants did not establish that Virginia was a more convenient forum or otherwise show that the § 1404(a) factors justified transfer.
2. The court had personal jurisdiction over the defendants, and venue in the Southern District of Ohio was proper under 28 U.S.C. § 1391(b)(1), (c)(2), and (d).

KEY QUOTATIONS

“Transfer pursuant to § 1404 must be “to a more convenient forum, not to a forum likely to prove equally convenient or inconvenient.”” (Opinion and Order, Section II)

“In the absence of jurisdictional or venue deficiencies and Defendants’ failure to distinguish this case from the Court’s previous TVPRA decisions regarding venue, the Court DENIES Defendants’ Motion (ECF No. 18).” (Opinion and Order, Section III)

FACTUAL BACKGROUND

Plaintiff, a Florida resident, alleges that she was trafficked for sex in 2015 at a Red Roof Inn property in Virginia Beach, Virginia. She sued Red Roof Inns, Inc. and Red Roof Franchising, LLC under the Trafficking Victims Protection Reauthorization Act, alleging that the defendants knew or should have known about the trafficking, facilitated it, and benefited from it. The corporate defendants have their principal places of business in the Southern District of Ohio.

PROCEDURAL HISTORY

Plaintiff filed a TVPRA action in the Southern District of Ohio. Defendants moved to transfer the action to the Eastern District of Virginia, Plaintiff opposed the motion, and Defendants filed a reply. The court denied the motion after finding that Ohio was a proper forum and that Defendants had not shown that transfer was warranted.

DISPOSITION

other

CASES CITED

- Kay v. Nat'l City Mortg. Co., 494 F. Supp. 2d 845, 849–50 (S.D. Ohio 2007)

- Moore v. Rohm & Haas Co., 446 F.3d 643, 647 n.1 (6th Cir. 2006)
- Moses v. Bus. Card Exp., Inc., 929 F.2d 1131, 1137 (6th Cir. 1991)
- Olin-Marquez v. Arrow Senior Living Mgmt., LLC, 586 F. Supp. 3d 759, 776, 778 (S.D. Ohio 2022)
- Youngblood v. Life Ins. Co. of N. Am., No. 3:16-CV-34, 2016 WL 1466559, at *1 (W.D. Ky. Apr. 14, 2016)
- Jamhour v. Scottsdale Ins. Co., 211 F. Supp. 2d 941, 945 (S.D. Ohio 2002)
- Van Dusen v. Barrack, 376 U.S. 612, 645–46 (1964)
- Shanehchian v. Macy's, Inc., 251 F.R.D. 287, 292 (S.D. Ohio 2008)
- Reese v. CNH Am. LLC, 574 F.3d 315, 320 (6th Cir. 2009)
- Phelps v. McClellan, 30 F.3d 658, 663 (6th Cir. 1994)
- Doe (S.S.) v. Red Roof Inns, Inc., et al., No. 2:24-cv-1780, 2025 WL 634434 (S.D. Ohio Feb. 27, 2025)
- In re Hotel TVPRA Litig., No. 2:22-cv-1924, 2023 WL 3075851, at *21 (S.D. Ohio Apr. 25, 2023)

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