

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PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown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)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION R.S., Plaintiff, Civil Action 2:25-cv-0965 Judge Algenon L. Marbley v.
Magistrate Judge Elizabeth P. Deavers RED ROOF INNS, INC., et al., Defendants. OPINION
AND ORDER This matter is before the Court on Defendants' Motion to Transfer Venue. (Mot.,
ECF No. 18.)

For the reasons stated herein, Defendants' Motion is DENIED. I. BACKGROUND Plaintiff R.S.,
a resident of Florida, alleges that she was trafficked for sex in 2015 at the Red Roof Inn located in
Virginia Beach, a franchisee of Defendants. (ECF No. 1, at ¶¶ 3–4, 19, 42.) Defendants Red Roof
Inns, Inc. and Red Roof Franchising, LLC each have their principal place of business in the
Southern District of Ohio. (Id. at ¶¶ 23–25, 33.)

On August 25, 2025, Plaintiff filed this action seeking to hold Defendants liable under the
Trafficking Victims Protection Reauthorization Act ("TVPRA"), 18 U.S.C. § 1595(a). (Id. at ¶¶
40–68.) Plaintiff alleges that Defendants knew that sex trafficking occurred on their property, they
facilitated and benefitted from Plaintiff's sex trafficking, and they knew or should have known of
Plaintiff's sex trafficking.

(Id. at ¶¶ 13, 17, 48.) Defendants moved this Court to transfer this case to the United States
District Court for the Eastern District of Virginia pursuant to 28 U.S.C. § 1404(a). (Mot. at PageID
91.) Plaintiff filed a response in opposition. (Resp., ECF No. 27.) Defendants filed a reply brief in
support of their Motion. (Reply, ECF No. 29.) This matter is ripe for judicial review.

II. STANDARD OF REVIEW Under 28 U.S.C. § 1404(a), "[f]or the convenience of parties and
witnesses, in the interest of justice, a district court may transfer any civil action to any other
district or division where it might have been brought." The threshold issue under § 1404(a) is
whether the action could be brought in the transferee court. *Kay v. Nat'l City Mortg.*

Co., 494 F. Supp. 2d 845, 849 (S.D. Ohio 2007). If a case could be brought in the transferee court, “the issue becomes whether transfer is justified under the balance of the language of § 1404(a).” *Id.* In balancing convenience, the Court must consider factors such as “the private interests of the parties, including their convenience and the convenience of potential witnesses, as well as other public- interest concerns, such as systemic integrity and fairness, which come under the rubric of ‘interests of justice.’” *Moore v. Rohm & Haas Co.*, 446 F.3d 643, 647 n.1 (6th Cir.

2006) (quoting *Moses v. Bus. Card Exp., Inc.*, 929 F.2d 1131, 1137 (6th Cir. 1991)). Relevant private interest factors to consider include the following: “(1) the plaintiff’s choice of forum; (2) where the parties reside; (3) the location of willing and unwilling witnesses; (4) the location of evidence; and (5) the locus of events that gave rise to the dispute.” *Olin-Marquez v. Arrow Senior Living Management, LLC*, 586 F. Supp. 3d 759, 776 (S.D.

Ohio 2022) (internal citations omitted). Relevant public interest factors include: “(1) the court’s interest in judicial economy; (2) docket congestion; (3) local interest in deciding the controversy at home; (4) the public’s general interest in systemic integrity and fairness; and (5) the court’s familiarity with the governing law.” *Id.* at 778 (citing *Youngblood v. Life Ins.*

Co. of N. Am., No. 3:16-CV-34, 2016 WL 1466559, at *1 (W.D. Ky. Apr. 14, 2016)). The moving party bears the burden to establish a need for transfer. *Kay*, 494 F. Supp. 2d at 849–50 (citing *Jamhour v. Scottsdale Ins. Co.*, 211 F. Supp. 2d 941, 945 (S.D. Ohio 2002)). Transfer pursuant to § 1404 must be “to a more convenient forum, not to a forum likely to prove equally convenient or inconvenient.” *Van Dusen v. Barrack*, 376 U.S. 612, 645–46 (1964); see also *Shanehchian v. Macy’s, Inc.*, 251 F.R.D.

287, 292 (S.D. Ohio 2008) (“[Section] 1404 does not allow... for transfer if that transfer would only shift the inconvenience from one party to another.”). Even where venue is proper, a district court may exercise its broad discretion to transfer a civil action to a more convenient forum pursuant to § 1404(a). See *Reese v. CNH Am. LLC*, 574 F.3d 315, 320 (6th Cir.

2009) (citing *Phelps v. McClellan*, 30 F.3d 658, 663 (6th Cir. 1994)). “Ultimately... the decision whether to transfer venue under § 1404(a) is committed to the sound discretion of the trial court.” *Levy v. Cain, Watters & Assocs., P.L.L.C.*, No. 2:09-cv-723, 2010 WL 271300, at *9 (S.D. Ohio Jan. 15, 2010); *Reese*, 574 F.3d at 320 (“As the permissive language of the transfer statute suggests, district courts have broad discretion to determine when party convenience or the interest of justice make a transfer appropriate.”) (quotation omitted).

III. ANALYSIS In front of the Court, yet again, is the issue of venue in a TVPRA case where the corporate defendants—Red Roof Inns, Inc. and its related corporate entities—are located in the Southern District of Ohio.¹ In accordance with its recent opinions denying motions to transfer ¹ See Case Nos. 2:22-cv-1924; 2:22-cv-2682; 2:22-cv-2734; 2:22-cv-3256; 2:22-cv-3258; 2:22- cv-

3416; 2:22-cv-3766; 2:22-cv-3767; 2:22-cv-3768; 2:22-cv-3769; 2:22-cv-3770; 2:22-cv- 3771; 2:22-cv-3772; 2:22-cv-3773; 2:22-cv-3774; 2:22-cv-3776; 2:22-cv-3778; 2:22-cv-3782; venue,2 absent jurisdictional or venue deficiencies, this Court will not exercise its discretionary power to transfer the cases to a different district court pursuant to § 1404.

Doe (S.S.) v. Red Roof Inns, Inc., et al., No. 2:24-cv-1780, 2025 WL 634434 (S.D. Ohio Feb. 27, 2025) (citing *In re Hotel TVPRA Litig.*, No. 2:22-cv-1924, 2023 WL 3075851, at *21 (S.D. Ohio Apr. 25, 2023)). While each case presents unique circumstances, this Court has repeatedly explained that the “public interest factors have become demonstrably more important, requiring this Court to consider the impact of transferring these cases as a whole, and not in isolation.” *Id.* at *3.

Defendants argue that the Court should transfer this case to the Eastern District of Virginia because the Section 1404 venue factors weigh in favor of transfer, as Plaintiff is not an Ohio resident and alleges she was trafficked at a Red Roof Inn-branded property in Virginia. (Mot. at PageID 91, 93–100.) Defendants fail to distinguish the Court’s numerous TVPRA decisions on venue.³ As a result, Defendants’ Motion requires minimal analysis.

Defendants fail to persuade the Court that it should reach a different outcome in this case. Nothing in the record of this case indicates that the importance of the public interest factors has diminished. Defendants do not assert that this Court lacks personal jurisdiction or that venue in the Southern District of Ohio is improper. Further, the Court finds that it has personal jurisdiction, and the Southern District of Ohio is a proper forum pursuant to 28 U.S.C. § 1391(b)(1), (c)(2), (d).

In the absence of jurisdictional or venue deficiencies and Defendants’ failure to distinguish 2:22-cv-3784; 2:22-cv-3786; 2:22-cv-3787; 2:22-cv-3788; 2:22-cv-3797; 2:22-cv-3839; 2:22-cv- 3842; 2:22-cv-3844; 2:22-cv-3845; 2:22-cv-3846. 2 See 2:24-cv-03076; 2:24-cv-03113; 2:24-cv-03919; 2:24-cv-03998; 2:24-cv-04058; 2:24-cv- 04061; 2:24-cv-04141; 2:24-cv-00389; 2:24-cv-3991.

³ Defendants “recognize” the Court’s prior decisions on venue, but omit any discussion of the Court’s analysis in prior decisions. (Reply, at PageID 245.) this case from the Court’s previous TVPRA decisions regarding venue, the Court DENIES Defendants’ Motion (ECF No. 18). IV. CONCLUSION For the foregoing reasons, the Court DENIES Defendants’ Motion (ECF No. 18) to Transfer Venue.

IT IS SO ORDERED. Date: March 4, 2026 /s/ Elizabeth A. Preston Deavers ELIZABETH A. PRESTON DEAVERS UNITED STATES MAGISTRATE JUDGE