

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK

Diamond Tucker St. Property, LLC v. Felicia B. Watson et al.

Diamond Tucker · No. 25-CV-1746 (JMF) · Decided March 11, 2026

SUMMARY

The Southern District of New York orders transfer of Diamond Tucker St. Property, LLC’s action against Felicia B. Watson and her law office to the District of Connecticut under 28 U.S.C. § 1406(a). The court concludes that venue and personal jurisdiction are likely improper in New York and South Carolina, while Connecticut has the relevant property and litigation connections; it notes that transfer would also be warranted under § 1404(a).

CASE DETAILS

COURT	United States District Court for the Southern District of New York
WRITING FOR THE COURT	Jesse M. Furman
JURISDICTION	United States District Court for the Southern District of New York
DECIDED	March 11, 2026
DOCKET	25-CV-1746 (JMF)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to dismiss for lack of personal jurisdiction or, alternatively, to transfer venue. Plaintiff consented to transfer but requested transfer to the District of South Carolina rather than the District of Connecticut.
STANDARD OF REVIEW	The court applied the statutory venue provisions and determined whether dismissal or transfer was warranted under 28 U.S.C. § 1406(a); it also considered the potential alternative transfer analysis under § 1404(a).
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Diamond Tucker St. Property, LLC v. Felicia B. Watson, Law Offices of Felicia B. Watson, PLLC

TOPICS

- venue
- personal jurisdiction
- civil procedure
- commercial litigation
- real estate

PRACTICE AREAS

civil procedure

venue

personal jurisdiction

commercial litigation

real estate

QUESTIONS PRESENTED

1. Whether venue was proper in the Southern District of New York under 28 U.S.C. § 1391(b).
2. If venue was improper, whether the action should be dismissed or transferred under 28 U.S.C. § 1406(a), and whether transfer to the District of Connecticut was appropriate.
3. Whether the court should address personal jurisdiction before venue.

HOLDINGS

1. Venue was almost certainly improper in the Southern District of New York because the claims had no connection to New York and concerned property and events centered in Connecticut.
2. When venue is improper, transfer to the District of Connecticut rather than dismissal was warranted because the action could have been brought there and personal jurisdiction and venue would be proper there.
3. The court appropriately addressed venue before personal jurisdiction because personal jurisdiction would likely exist in the transferee district.

KEY QUOTATIONS

“where personal jurisdiction would likely exist in the transferee district over a defendant who contests personal jurisdiction in the Southern District of New York, it is prudentially appropriate to address venue first.” (at 2)

FACTUAL BACKGROUND

The action arose from a transaction involving real property located in Easton, Connecticut and appeared to involve claims arising under Connecticut law. The complaint alleged that the Law Offices of Felicia B. Watson, PLLC was a Connecticut citizen. The court found no meaningful connection between the claims and New York or South Carolina, while concluding that both venue and personal jurisdiction would plainly be proper in Connecticut.

PROCEDURAL HISTORY

Diamond Tucker filed an action in the Southern District of New York concerning a transaction involving property in Easton, Connecticut. Defendants moved under Federal Rule of Civil Procedure 12(b) and sought transfer to the District of Connecticut. After the Judicial Panel on Multidistrict Litigation denied plaintiff's separate transfer motion, the court determined that venue in New York was almost certainly improper and ordered transfer to the District of Connecticut under 28 U.S.C. § 1406(a).

DISPOSITION

other

REMAND INSTRUCTIONS

The Clerk of Court was directed to transfer the action to the United States District Court for the District of Connecticut, terminate ECF No. 32, and close the case in the Southern District of New York.

CASES CITED

- *Vierra v. Doe*, No. 26-CV-904 (LTS), 2026 WL 579381, at *1 (S.D.N.Y. Feb. 27, 2026)
- *Iragorri v. United Tech. Corp.*, 274 F.3d 65, 72 (2d Cir. 2001)
- *Everlast World’s Boxing Headquarters Corp. v. Ringside, Inc.*, 928 F. Supp. 2d 735, 741 (S.D.N.Y. 2013)
- *N.Y. Marine & Gen. Ins. Co. v. LaFarge N. Am., Inc.*, 599 F.3d 102, 112 (2d Cir. 2010)

OPINION

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----- X DIAMOND TUCKER ST. PROPERTY, LLC,:
Plaintiff,: 25-CV-1746 (JMF) -v-: MEMORANDUM OPINION FELICIA B. WATSON et al.,:
AND ORDER Defendants.: ----- X JESSE
M. FURMAN, United States District Judge: Plaintiff Diamond Tucker St. Property, LLC
 (“Diamond Tucker”) brings claims against Felicia B. Watson and the Law Offices of Felicia B.
Watson, PLLC, relating to a transaction for the sale of a property located in Easton, Connecticut.

See ECF No. 31 (“FAC”), ¶ 24. Defendants move to dismiss pursuant to Rule 12(b) of the Federal Rules of Civil Procedure or, in the alternative, to transfer venue to the United States District Court for the District of Connecticut. See ECF No. 32; see also ECF No. 32-14 (“Defs.’ Mem.”). Diamond Tucker “accepts Defendants’ agreement to transfer” the action but seeks transfer to the United States District Court for the District of South Carolina instead.

ECF No. 40 (“Pl.’s Opp’n”), at 26.1 0F As relevant here, venue is proper in either “a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located” or “a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred.” 28 U.S.C. § 1391(b)(1)-(2). If venue is improper, 28 U.S.C. § 1406(a) provides that a district 1 The Court had deferred decision on Defendants’ motion because Diamond Tucker had filed a motion with the Judicial Panel on Multidistrict Litigation (“JPML”) to transfer this case to the Northern District of New York.

See ECF No. 44. By Order entered here on February 20, 2026, the JPML denied that motion. See ECF No. 46. court “shall dismiss, or if it be in the interest of justice, transfer such case to any district or division in which it could have been brought.” Id. § 1406(a). Applying these provisions

here, the Court concludes that venue is almost certainly improper in this District and that transfer to the District of Connecticut is warranted.

That is because Diamond Tucker's claims have no connection to New York whatsoever; instead, they relate to property in Connecticut and appear to arise under Connecticut law. See FAC ¶¶ 15, 24-25, 27. Moreover, the First Amended Complaint explicitly alleges that the Law Offices of Felicia B. Watson, PLLC "is a citizen of the State of Connecticut." Id. ¶ 15.2 1F Notably, Diamond Tucker itself consents to transfer; it merely argues that transfer should be to the District of South Carolina rather than the District of Connecticut.

That argument, however, is utterly without merit. This case has no more connection to South Carolina than it does to New York. Nothing relevant to the case is alleged to have happened in South Carolina. And while Diamond Tucker alleges a connection between Watson and South Carolina, see, e.g., FAC ¶ 3, it casts doubt on that connection itself, see id. ¶¶ 4-6, 7-8, 12, 18-19, and, in any event, alleges no such connection between the Law Offices of Felicia B. Watson, PLLC and South Carolina.

Thus, venue is almost certainly improper in South Carolina, and it is doubtful that there would be personal jurisdiction over both Defendants in South Carolina. Making matters worse, Diamond Tucker itself has no connection to South Carolina (let alone to this District), see FAC ¶ 2, so its choice of forum is "accorded less deference," *Vierra v. Doe*, No. 26-CV-904 2 Relatedly, it is doubtful that this Court could exercise personal jurisdiction over Defendants; by contrast, it is plain that personal jurisdiction over both Defendants would be proper in the District of Connecticut.

Defendants move to dismiss on that basis, but "where personal jurisdiction would likely exist in the transferee district over a defendant who contests personal jurisdiction in the Southern District of New York, it is prudentially appropriate to address venue first." *Everlast World's Boxing Headquarters Corp. v. Ringside, Inc.*, 928 F. Supp. 2d 735, 741 (S.D.N.Y.

2013) (internal quotation marks omitted). (LTS), 2026 WL 579381, at *1 (S.D.N.Y. Feb. 27, 2026) (citing */ragorri v. United Tech. Corp.*, 274 F.3d 65, 72 (2d Cir. 2001)). Its sole argument in favor of the District of South Carolina is the fact that it has filed a "collateral" lawsuit against Watson there, see Pl.'s Opp'n 5, 26-27, but that does not come close to establishing that venue and personal jurisdiction over both Defendants would be proper in that District.

In short, pursuant to Section 1406(a), the Court ORDERS transfer of this case to the United States District Court for the District of Connecticut.' Accordingly, the Clerk of Court is directed to terminate ECF No. 32, to transfer this action to the United States District Court for the District of Connecticut, and to close the case in this Court. SO ORDERED Dated: March 11, 2026 New York,

New York ESSE RMAN nited States District Judge 3 Moreover, Diamond Tucker seems to be seeking relief in the courts of Connecticut as well.

See ECF No. 42, at 2. That and its previous efforts to have this case transferred to the Northern District of New York, see *supra* note 1, render its choice of South Carolina as the preferred forum for transfer of this case even more dubious. 4 If venue were proper in this District, the Court would nevertheless reach the same result and transfer the case to the District of Connecticut pursuant to 28 U.S.C. § 1404(a), which provides, in relevant part, that, “[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.” 28 U.S.C. § 1404(a).

Given the many connections between this case and Connecticut (and the comparatively few connections with New York and South Carolina), the factors that guide that inquiry would plainly call for transfer to Connecticut. See, e.g., *N.Y. Marine & Gen. Ins. Co. v. LaFarge No. Am., Inc.*, 599 F.3d 102, 112 (2d Cir. 2010).