

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PRECEDENTIAL VALUE	nonprecedential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)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-southern-district-of-ne/2026/diamond-tucker-st-property-llc-v-felicia-b-watson-et-al-3sw5xmcp>