

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Jane Doe (S.E.S., an individual) v. Choice Hotels International, Inc.,
et al.

Doe · No. Civil Action No. DKC 24-3776 · Decided November 25, 2025

SUMMARY

The United States District Court for the District of Maryland grants Choice Hotels International, Inc. and Choice Hotels International Service Corp.'s motion to transfer a Trafficking Victims Protection Reauthorization Act action to the Southern District of Alabama. The court concludes that the action could have been brought there and that the convenience of witnesses and parties, as well as the interest of justice, favor transfer. The court leaves the defendants' alternative motion to dismiss, a nonparty's correspondence, and the plaintiff's motion for leave to amend for resolution by the transferee court.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Deborah K. Chasanow
JURISDICTION	United States District Court for the District of Maryland
DECIDED	November 25, 2025
DOCKET	Civil Action No. DKC 24-3776
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff brought a three-count action under the Trafficking Victims Protection Reauthorization Act against Choice Hotels International, Inc., Choice Hotels International Service Corp., and Phillip Hall Properties, L.L.C. Choice Defendants moved to transfer the action to the United States District Court for the Southern District of Alabama or, alternatively, to dismiss.
STANDARD OF REVIEW	A transfer decision under 28 U.S.C. § 1404(a) is committed to the sound discretion of the district court. The moving party bears the burden of showing that transfer is proper.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum opinion

TOPICS

- venue
- personal jurisdiction
- civil procedure
- civil rights

PRACTICE AREAS

civil procedure

personal jurisdiction

venue

human trafficking civil litigation

civil rights

QUESTIONS PRESENTED

1. Whether the action could have been brought in the Southern District of Alabama for purposes of transfer under 28 U.S.C. § 1404(a).
2. Whether the convenience of the parties and witnesses and the interest of justice favored transferring the action from the District of Maryland to the Southern District of Alabama.
3. Whether the court needed to decide the challenged venue and personal-jurisdiction issues under 28 U.S.C. § 1406 before transferring the case under § 1404(a).

HOLDINGS

1. The action could have been brought in the Southern District of Alabama because a substantial part of the events giving rise to the claims occurred there and the defendants were subject to personal jurisdiction there.
2. Transfer to the Southern District of Alabama was warranted because Plaintiff's choice of the Maryland forum was entitled to diminished deference, Alabama was more convenient for the likely witnesses and parties, and the interest of justice strongly favored keeping the litigation against the defendants in one forum.
3. The court did not need to decide whether Maryland venue was improper or whether Maryland had personal jurisdiction over the franchisee because transfer under § 1404(a) was available.

KEY QUOTATIONS

"The threshold question on a motion to transfer is whether the action might have been brought in the transferee forum." (7)

"The burden is on the moving party to show that transfer to another forum is proper." (10)

"The interest of justice strongly favors transfer." (19)

FACTUAL BACKGROUND

Plaintiff alleges that she was sex trafficked repeatedly at a Quality Inn hotel in Mobile, Alabama, between July 2013 and at least December 2014. She alleges that the hotel franchisee and Choice Defendants knew or should have known of trafficking because of numerous red flags, including cash or prepaid-room payments, prolonged use of a do-not-disturb sign, repeated short visits by men, and apparent prostitution activity. She further alleges that the defendants knowingly benefited by continuing to rent rooms used for the trafficking.

PROCEDURAL HISTORY

Plaintiff filed the operative complaint on March 31, 2025. Choice Defendants moved on April 14, 2025, to transfer under 28 U.S.C. §§ 1404(a) and 1406 or to dismiss under Rule 12(b)(3); briefing followed. The court

granted transfer to the Southern District of Alabama and left the alternative dismissal motion, nonparty Trent Hall's correspondence, and Plaintiff's motion for leave to amend for resolution by the transferee court.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case was transferred to the United States District Court for the Southern District of Alabama. The transferee court was to resolve the alternative motion to dismiss, Trent Hall's correspondence, and Plaintiff's motion for leave to amend.

CASES CITED

- Doe (C.T.K.) v. Choice Hotels International, Inc., No. 24-cv-2836-DLB, 2025 WL 2430024 (D. Md. Aug. 22, 2025)
- Pilz v. Pere, No. 07-cv-1314-CCB, 2007 WL 2572433 (D. Md. Aug. 30, 2007)
- Howard University v. Watkins, No. 06-cv-2076-DKC, 2007 WL 763182 (D. Md. Mar. 12, 2007)
- Corry v. CFM Majestic Inc., 16 F. Supp. 2d 660, 663 (E.D. Va. 1998)
- International Shoe Co. v. State of Washington, International Shoe Co. v. Washington, 326 U.S. 310, 316 (1945)
- Milliken v. Meyer, 311 U.S. 457, 463 (1940)
- Helicopteros Nacionales de Colombia, S.A. v. Hall, 466 U.S. 408, 414 & n.8 (1984)
- Daimler AG v. Bauman, 571 U.S. 117, 127, 137 (2014)
- Trustees of the Plumbers and Pipefitters National Pension Fund v. Plumbing Services, Inc., 791 F.3d 436, 444 (4th Cir. 2015)
- Lynch v. Vanderhoef Builders, 237 F. Supp. 2d 615, 617 (D. Md. 2002)
- Gilbert v. Freshbikes, LLC, 32 F. Supp. 3d 594, 607 (D. Md. 2014)
- Cross v. Fleet Reserve Association Pension Plan, 383 F. Supp. 2d 852, 856 (D. Md. 2005)
- Van Dusen v. Barrack, 376 U.S. 612, 616 (1964)
- Hausfeld v. Love Funding Corp., 16 F. Supp. 3d 591, 604-05 (D. Md. 2014)
- Mamani v. Bustamante, 547 F. Supp. 2d 465, 469, 473 (D. Md. 2008)
- Sinochem International Co. v. Malaysia International Shipping Corp., 549 U.S. 422, 430 (2007)
- Piper Aircraft Co. v. Reyno, 454 U.S. 235, 255 (1981)
- Doe (J.S.H.) v. Choice Hotels International, Inc., No. 24-cv-1598-TDC, 2025 WL 2108792 (D. Md. July 28, 2025)
- Doe (J.L.K.) v. Choice Hotels International, Inc., No. 24-cv-3774-GLR, 2025 WL 2197035 (D. Md. Aug. 1, 2025)
- Doe (A.E.W.) v. Choice Hotels International, Inc., No. 24-cv-3769-TDC, 2025 WL 2468510 (D. Md. Aug. 27, 2025)

- A.M.G. v. Red Roof Inns, Inc., No. 23-cv-4195, 2025 WL 588645 (S.D. Ohio Feb. 24, 2025)
- International Painters & Allied Trade Industry Pension Fund v. Marrero Glass & Metal Inc., No. 18-cv-452-ELH, 2019 WL 423409 (D. Md. Feb. 1, 2019)
- Carey v. Bayerische Hypo-Und Vereinsbank AG, 370 F.3d 234, 237-38 (2d Cir. 2004)
- Elliot AmQuip, LLC v. Bay Electric Co., No. 10-cv-3598-ELH, 2011 WL 2174893 (D. Md. June 2, 2011)
- Pinpoint IT Services, L.L.C. v. Atlas IT Export Corp., 812 F. Supp. 2d 710, 721 (E.D. Va. 2011)
- Gennari Consulting, Inc. v. Wellington Corp., LLC, No. 19-cv-1851-ELH, 2019 WL 6829102, at *9 (D. Md. Dec. 13, 2019)
- Capitol Payment Systems, Inc. v. Di Donato, No. 16-cv-882-ELH, 2017 WL 2242678, at *14 (D. Md. May 23, 2017)
- Atlantic Marine Construction Co. v. U.S. District Court for the Western District of Texas, 571 U.S. 49, 62 n.6 (2013)

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