

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Papa v. IAT Insurance Group, Inc.

No. 25-cv-04049 · No. No. 25-cv-04049 · Decided March 3, 2026

SUMMARY

The District of New Jersey grants IAT Insurance Group, Inc.’s motion to transfer an employment-discrimination action to the Eastern District of North Carolina under 28 U.S.C. § 1404(a). The court concludes that the relevant employment decisions were primarily made in North Carolina, that private-interest factors favor transfer, and that public-interest factors are neutral or favor transfer. The action includes claims under the ADA, ADEA, NJLAD, and FMLA.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Christine P. O'Hearn
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	March 3, 2026
DOCKET	No. 25-cv-04049
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under 28 U.S.C. § 1404(a) to transfer the action from the District of New Jersey to the Eastern District of North Carolina. The court granted the motion.
STANDARD OF REVIEW	The court applied the discretionary transfer standard under 28 U.S.C. § 1404(a), weighing the nonexclusive private- and public-interest factors identified in <i>Jumara v. State Farm Insurance Co.</i>
PRECEDENTIAL VALUE	Unknown

TOPICS

- venue
- civil procedure
- employment discrimination
- ada / disability

PRACTICE AREAS

- civil procedure
- employment law
- employment discrimination
- ada / disability

QUESTIONS PRESENTED

1. Whether the action should be transferred from the District of New Jersey to the Eastern District of North Carolina under 28 U.S.C. § 1404(a).
2. Whether the private- and public-interest factors, including the location of the operative employment decisions, witnesses, court congestion, and local interests, favored transfer.

HOLDINGS

1. Transfer to the Eastern District of North Carolina was warranted because the private- and public-interest factors, considered together, favored that forum.
2. For this remote-employment dispute, the claims principally arose where the challenged employment decisions were made, rather than solely where Plaintiff worked remotely or felt the effects of those decisions.

KEY QUOTATIONS

“Considering all the relevant factors and interests under § 1404(a), for the reasons that follow, the Court finds that the private and public interest factors as a whole favor transfer.”

“Consistent with Wayne and Khartchenko, here the conduct giving rise to Plaintiff’s claims centers on where Defendant’s employment decisions were made rather than where Plaintiff resided.”

FACTUAL BACKGROUND

Rosemarie Papa, a New Jersey resident, worked remotely from New Jersey for IAT Insurance Group, a North Carolina corporation headquartered in Raleigh. Her employment involved remote training and travel to several states, including regular visits to IAT’s North Carolina headquarters. She alleged discrimination, retaliation, hostile treatment, and interference involving her age, disability, medical leave, accommodation requests, and FMLA benefits. The challenged employment decisions were principally made by IAT personnel located in North Carolina or Illinois, while Papa experienced and received many of the decisions electronically in New Jersey.

PROCEDURAL HISTORY

Plaintiff filed claims under the ADA, ADEA, NJLAD, and FMLA in the District of New Jersey. Defendant answered and then moved to transfer venue under § 1404(a), arguing that North Carolina was a more convenient forum because the relevant employment decisions, witnesses, and records were principally located there. After briefing and without oral argument, the court granted the motion and directed the Clerk to transfer the action to the Eastern District of North Carolina.

DISPOSITION

other

REMAND INSTRUCTIONS

The Clerk of Court shall transfer the action to the United States District Court for the Eastern District of North Carolina.

CASES CITED

- Yacovella v. Apparel Imports, Inc., No. 14-5484, 2015 WL 5098009, at *3, *8 (D.N.J. Aug. 31, 2015)
- Ricoh Co. v. Honeywell, Inc., 817 F. Supp. 473, 479 (D.N.J. 1993)
- Jumara v. State Farm Insurance Co., 55 F.3d 873, 878-80 (3d Cir. 1995)
- Halpern v. Centroid Systems, Inc., No. 24-7037, 2024 WL 4533370, at *9-10 (D.N.J. Oct. 21, 2024)
- Beaumont v. Vanguard Logistics Services (USA), Inc., 615 F. Supp. 3d 253, 259 (D.N.J. 2022)
- Shutte v. Armco Steel Corp., 431 F.2d 22, 25 (3d Cir. 1970)
- West v. NNIT, Inc., No. 24-38, 2024 WL 3509512, at *8 (D.N.J. July 23, 2024)
- Allied Old English, Inc. v. Uwajimaya, Inc., No. 11-1239, 2012 WL 3564172, at *4 (D.N.J. Aug. 16, 2012)
- Wayne v. Fuji Photo Film USA, Inc., No. 07-5536, 2008 WL 3832406, at *2, *4 (E.D. Pa. Aug. 14, 2008)
- Khartchenko v. American Oncologic Hospital, Inc., No. 23-23043, 2025 WL 3140604, at *2-3 (D.N.J. Nov. 10, 2025)
- Dilmore v. Alion Science and Technology Corp., No. 11-72, 2011 WL 1576021, at *5-7 (W.D. Pa. Apr. 21, 2011)
- Grieco v. Alacrity Adjusting Solutions, LLC, No. 24-3023, 2025 WL 2712211, at *2 (E.D. Pa. Sept. 23, 2025)
- Wilson v. JPMorgan Chase, No. 18-13789, 2020 WL 3168539, at *4 (D.N.J. June 15, 2020)
- SI Power LLC v. Pathway Holdings Management V, LLC, No. 15-6101, 2016 WL 7130920, at *9 (D.N.J. Dec. 7, 2016)
- Schurr v. Resorts International Hotel, Inc., 196 F.3d 486, 498 (3d Cir. 1999)
- Booth v. Citizens Bank, N.A., No. 22-5276, 2023 WL 3916275, at *6 (D.N.J. June 9, 2023)