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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

JOAO CONTROL & MONITORING SYSTEMS, LLC, Plaintiff, v. **FORD MOTOR COMPANY,** Defendant.	Case No. 2:12-cv-0033-DOC-RNBx **DEFENDANT FORD MOTOR COMPANY'S NOTICE OF MOTION AND MOTION TO TRANSFER** Hearing Date: August 13, 2012 8:30 AM Place: Santa Ana, Courtroom 9D Judge: David O. Carter

PLEASE TAKE NOTICE that on Monday, August 13, 2012, at 8:30 a.m., or as soon thereafter as counsel may be heard, Ford Motor Company, will, and hereby does, move the Court, pursuant to 28 U.S.C. § 1404(a), to transfer the case to the Eastern District of Michigan. This Motion is based on this Notice, the accompanying Memorandum In Support, and the Declaration of David Hatton in support. This Motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on April 24, 2012, and subsequently on July 12, 2012.

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Dated: July 13, 2012

Respectfully submitted,

By: /s/ Marc Lorelli

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JOAO CONTROL & MONITORING SYSTEMS, LLC, Plaintiff, v. **FORD MOTOR COMPANY,** Defendant.	Case No. 2:12-cv-0033-DOC-RNBx **DEFENDANT FORD MOTOR COMPANY'S MOTION TO TRANSFER** Hearing Date: August 13, 2012 8:30 A.M. Place: Santa Ana, Courtroom 9D Judge: David O. Carter

This patent infringement case involves Ford Motor Company's ("Ford") "Sync 911 Assist" system, which is an option offered by Ford in certain of its vehicles. Ford brings this Motion to Transfer because neither it nor Plaintiff Joao Control & Monitoring Systems, LLC ("Joao"), nor any of the claims asserted in this action is meaningfully tied to this forum.

That is, Joao is a Delaware corporation with its principal place of business in New York. Joao does not indicate in its complaint that it has any ties to the forum state which pertain to its claims. Joao further seems to only claim that this action is connected to this forum via sales of the accused product in California.

However, and Ford is global company headquartered in Dearborn, Michigan, which sells vehicles and related products throughout the United States. Under such circumstances, California district courts and the Federal Circuit have said that the fact of sales alone does not establish a meaningful tie to a state.

Therefore, Ford requests pursuant to 28 U.S.C. § 1404(a) that this matter be transferred to the Eastern District of Michigan where Ford has its headquarters and central operations, where the accused product was developed, and where key witnesses and evidence are located. The accompanying brief in support sets forth in greater detail the factual and legal bases for the relief requested in this motion.

Dated: July 13, 2012

Respectfully submitted,

By: /s/ Marc Lorelli

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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on July 13, 2012, I electronically filed the foregoing **DEFENDANT FORD MOTOR COMPANY'S NOTICE OF MOTION AND MOTION TO TRANSFER** with the Clerk of the Court for the Central District of California using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

Respectfully submitted,

By: /s/ Marc Lorelli

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