

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BOT M8 LLC,

Plaintiff,

v.

SONY CORPORATION OF AMERICA,
SONY CORPORATION, and SONY
INTERACTIVE ENTERTAINMENT
AMERICA LLC,

Defendants.

Civil Action No. 1:19-cv-07529-DLC

**SONY INTERACTIVE ENTERTAINMENT LLC'S NOTICE
OF MOTION TO TRANSFER DUE TO IMPROPER VENUE**

PLEASE TAKE NOTICE THAT defendant Sony Interactive Entertainment LLC (“SIE”) hereby moves pursuant to Federal Rule 12(b)(3) and 28 U.S.C. §§ 1400(b) and 1406(a) to transfer the patent infringement claims brought by plaintiff Bot M8 LLC (“Bot”) due to improper venue. As explained in the accompanying memorandum of law, venue is not proper in this District under 28 U.S.C. § 1400(b) because SIE is a California limited liability company, with its headquarters located in California, and with no regular and established place of business in this District. Accordingly, Bot’s Complaint against SIE should be transferred under 28 U.S.C. § 1406(a) to the Northern District of California, where both parties are located.

DATED: October 3, 2019

Respectfully submitted,

/s/ Gregory S. Arovas

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