

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 21-1644 (MN)
)	
UNITED STATES SUGAR)	
CORPORATION, UNITED SUGARS)	
CORPORATION, IMPERIAL SUGAR)	
COMPANY, and LOUIS DREYFUS)	
COMPANY LLC,)	
)	
Defendants.)	

**DEFENDANTS’ MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a) OR TO EXPEDITE TRIAL**

Pursuant to 28 U.S.C. § 1404(a), Defendants United States Sugar Corporation, United Sugars Corporation, Imperial Sugar Company, and Louis Dreyfus Company LLC (collectively, “Defendants”) respectfully move this Court to transfer this action to the United States District Court for the Southern District of Georgia, or, in the alternative, expedite the trial to occur no later than April of 2022. The grounds for the motion are set forth in Defendants’ Opening Brief in Support of Their Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) or to Expedite Trial, filed concurrently herewith.

Pursuant to D. Del. L.R. 7.1.1, Defendants have conferred with counsel for the plaintiff, which intends to oppose the Motion.

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December 3, 2021

RULE 7.1.1 CERTIFICATE

Pursuant to D. Del. LR 7.1.1, counsel for Defendants United States Sugar Corporation certifies that counsel for the parties, including Delaware counsel, discussed the subject matter of the foregoing motion and the relief sought, and that the parties have been unable to reach agreement.

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)

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CORPORATION, IMPERIAL SUGAR)	
COMPANY, and LOUIS DREYFUS)	
COMPANY LLC,)	
)	
Defendants.)	

**[PROPOSED] ORDER GRANTING DEFENDANTS’ MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a) OR TO EXPEDITE TRIAL**

This matter is before the Court on Defendants’ Motion to Transfer Venue Pursuant To 28 U.S.C. § 1404(a) Or To Expedite Trial (“Motion”). For good cause shown, the Motion is GRANTED, and it is HEREBY ORDERED that:

The Clerk of Court is directed to transfer this action to the U.S. District Court for the Southern District of Georgia, Savannah Division, pursuant to 28 U.S.C. § 1404(a).

IT IS SO ORDERED THIS _____ DAY OF _____, 2021.

HONORABLE MARYELLEN NOREIKA
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 3, 2021, upon the following in the manner indicated:

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