

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ILLUMINA, INC. AND GRAIL, INC.,

Defendants.

Civil Action No. 1:21-cv-00873-RC

**DEFENDANTS' MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a)**

Pursuant to 28 U.S.C. § 1404(a), Defendants Illumina, Inc. (“Illumina”) and GRAIL, Inc. (“GRAIL”) (collectively, “Defendants”) respectfully move this Court to transfer this action to the United States District Court for the Southern District of California. This case centers on a proposed transaction between two companies headquartered in California. Defendant Illumina, Inc. is headquartered in San Diego, California and Defendant GRAIL, Inc. is headquartered in Menlo Park, California. All relevant events related to the proposed transaction occurred in California. All expected party witnesses are located in California. The majority of third party witnesses are also located in California. Defendants have strong ties to California and the transaction will have cognizable effects in the state. In contrast, the Federal Trade Commission alleges no meaningful connection between this case and the District of Columbia.

For the reasons set forth in the accompanying Memorandum of Points and Authorities in Support of Defendants' Motion to Transfer Venue, and in the accompanying Declarations of Roland Schwillinski and Marissa Lee Song, the Court should transfer this action to the United States Court for the Southern District of California.

Dated: April 2, 2021

Respectfully submitted,

/s/ Preston Burton

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(m), the undersigned certifies that the parties have conferred about the contents of this motion and were unable to reach agreement.

/s/ Preston Burton

Preston Burton

CERTIFICATE OF SERVICE

The undersigned certifies that on April 2, 2021, the foregoing document was served on all attorneys of record via the Court's CM/ECF system.

/s/ Preston Burton

Preston Burton