

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

_____)	
Three Angels Broadcasting Network, Inc.,)	
an Illinois non-profit corporation, and)	
Danny Lee Shelton, individually,)	Case No.: 0:08-mc-7
)	
Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
Defendants.)	
_____)	

**MEMORANDUM IN SUPPORT OF DEFENDANT ROBERT PICKLE’S
EMERGENCY MOTION FOR INTRA-DISTRICT TRANSFER OF VENUE**

Questions of intra-district venue can be dealt with in light of 28 U.S.C. § 1404, which states in part, “For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought.”

Plaintiffs Three Angels Broadcasting Network, Inc., and Danny Shelton are located or reside in southern Illinois in Franklin County. Defendant Gailon Arthur Joy resides near Worcester, Massachusetts, the venue chosen by the Plaintiffs for their lawsuit which they filed in April 2007. Defendant Robert Pickle resides in Halstad Township, Norman County, Minnesota, about 35 miles north of Moorhead, Minnesota, and about 280 miles from St. Paul. Defendant Pickle is therefore the only party who resides in Minnesota.

Defendant Pickle wishes to be present in person for hearings in the instant miscellaneous case, and would find it unduly burdensome to travel 280 miles to the courthouse in St. Paul. An

intra-district transfer of venue to Fergus Falls would therefore result in much greater convenience for Defendant Pickle.

It would also be in the interest of justice for the hearings of the instant miscellaneous case to be conducted where Defendant Pickle can more easily attend.

Respectfully submitted,

Dated: February 14, 2008

s/ Robert Pickle, pro se
Robert Pickle, *pro se*
Halstad, MN 56548
Tel: (218) 456-2568
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AFFIDAVIT OF SERVICE

Under penalty of perjury, I, Bob Pickle, do certify that I am over the age of 18 years of age and on this day I have caused service of this document to the Court and have served by first class mail, postage prepaid, a copy of this document and this Certificate of Service to Plaintiffs' counsel at Siegel, Brill, Greupner, Duffy & Foster, and by email to Gailon Arthur Joy.

Dated: February 14, 2008

s/ Bob Pickle

Subscribed and sworn to me
this 14th day of February, 2008.

s/ Deanna Zimmerman
Notary Public

My commission expires Jan. 31, 2010