

**United States District Court  
District of Minnesota**

Christopher Roller  
(Plaintiff)

Civil Action No. 05-CV-1297

vs.

GE Medical Systems Information  
Technologies, Inc.  
(Defendant)

**OPPOSITION TO MOTION TO  
CHANGE VENUE**

**ARGUMENTS AND FACTUAL STATEMENTS**

Defense statements are in blue.

Minnesota's only link to this case is the fact that Plaintiff decided to move to Minnesota after his employment with GEMS IT ended. If Plaintiff had not moved, there would be absolutely no contact with Minnesota.

1. I had no choice but to move. GEMS IT fired me, and I had to move because I had no money. I didn't "decide", I was forced to move to a more affordable living arrangement (home) while deciding on a suicide epitaph. I was originally hired from Minnesota (home), and that's where I went back to after the firing.
2. Minnesota is just 4 miles from Sioux Falls, South Dakota, like I moved real far to get to Minnesota, my place of origin.

Moreover, many of the documents relating to the dispute are located in South Dakota, as are most of the other sources of evidence that shed light on whether or not Plaintiff was discriminated against. Here, almost every

single fact witness with any relevant information is located in South Dakota.

3. Documents can be submitted from anywhere. ECF makes this possible.
4. I will agree to depose in Sioux Falls, South Dakota. Only time GEMS IT employees need to come to Minnesota is during trial. That's 4 days long. They will still get paid. GEMS IT can pay their hotel. I am on a very limited budget, not having the resources GEMS IT has to pay hotel costs, etc.

Here, the “local court determines local law” factor weighs in favor of transfer. This Court recently concluded the South Dakota statute of limitations applies to Plaintiff’s claim, and relying on South Dakota law, this Court denied GEMS IT’s motion to dismiss Plaintiff’s claim pursuant to Fed. R. Civ. P. 12(b)(6). While this Court is no doubt capable of applying South Dakota law to Plaintiff’s claim, there are advantages to having a South Dakota matter decided by a court in the District of South Dakota.

5. Defense is unhappy with this judge's decision on non-dismissal and wants somebody else to hear the case.
6. Change of venue may require a schedule change.
7. Plaintiff is nervous that any other future proceedings may need to be done in South Dakota if venue is moved, and plaintiff lacks resources to travel much. Whereas, GEMS IT legal is located in Milwaukee, WI. They've got to travel no matter what happens.
8. I have related cases, and that may require the same judge to preside over them all.

9. I have many cases in progress as pro se, and I lack the time resources to travel to South Dakota.

### **SUMMARY**

Change of venue is more inconvenient for the plaintiff who does not have the time and financial resources required to travel much, and as a result, plaintiff opposes motion to change venue.

Respectfully submitted,

Date: Jan 26, 2006

\_\_\_\_\_s/\_Christopher A. Roller\_\_\_\_\_  
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