

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DANIEL B. McDONALD,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 08-cv-4088
)	
STRATA-G, LLC and DANIEL H.)	
HURST, Individually,)	
)	
Defendants.)	

**MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION, TO TRANSFER
VENUE OR, IN THE ALTERNATIVE, TO DISMISS**

Defendants Strata-G, LLC and Daniel H. Hurst, by their attorneys, John P. Lynch, Jr., Kimberly A. Ross and CREMER, KOPON, SHAUGHNESSY & SPINA, LLC, and pursuant to Rules 12(b)(2) and 12(b)(3) of the Federal Rules of Civil Procedure and 28 U.S.C. section 1404(a), move this Honorable Court to dismiss this civil action for lack of personal jurisdiction over Daniel H. Hurst, to transfer the remainder of this action to the Eastern District of Tennessee or, in the alternative, to dismiss the entirety of this action on the basis of *forum non conveniens*.

A Memorandum in support of this Motion is filed herewith.

Respectfully submitted,

STRATA-G, LLC and DANIEL H. HURST

/s/ John P. Lynch, Jr.

John P. Lynch, Jr.

CREMER, KOPON, SHAUGHNESSY & SPINA, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2008, a copy of the foregoing was filed electronically. Notice of filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access the filing through the Court's electronic filing system.

/s/ John P. Lynch, Jr.
John P. Lynch, Jr.

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