

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

CHILDREN’S HEALTH DEFENSE,)	
TRIALSITE, INC., CREATIVE)	
DESTRUCTION MEDIA, LLC, ERIN)	
ELIZABETH FINN, JIM HOFT, DR. BEN)	
TAPPER, BEN SWANN, DR. JOSEPH)	
MERCOLA, TY BOLLINGER,)	
CHARLENE BOLLINGER & JEFF)	
CROUERE,)	Civil Action No. 3:23-cv-00720
)	
<i>Plaintiffs,</i>)	Judge Terry A. Doughty
v.)	
)	Magistrate Judge Kayla D. McClusky
WP COMPANY LLC D/B/A THE)	
WASHINGTON POST, THE BRITISH)	
BROADCASTING CORP., THE)	
ASSOCIATED PRESS, & REUTERS)	
NEWS & MEDIA, INC.,)	
)	
<i>Defendants.</i>)	

**THE ASSOCIATED PRESS, REUTERS NEWS & MEDIA INC.,
AND WP COMPANY LLC’S MOTION TO TRANSFER**

Pursuant to 28 U.S.C. § 1404, the Associated Press, Reuters News & Media Incorporated, and WP Company LLC d/b/a The Washington Post (collectively, “Defendants”) request this Court transfer Plaintiffs’ lawsuit to the United States District Court for the Southern District of New York or the United States District Court for the District of Columbia.

A brief in support of this motion, setting forth the argument and authorities upon which Defendants rely, is filed simultaneously under separate cover pursuant to Local Rule 7.1. The matters required under Local Rule 7.4 are set forth in the brief.

WHEREFORE, Defendants respectfully request the Court transfer this case to the United States District Court for the Southern District of New York or the United States District Court for the District of Columbia.

Dated: July 11, 2023

Respectfully submitted,

/s/ Leslie E. John

Leslie E. John (*pro hac vice*, #917698)
Elizabeth P. Weissert (*pro hac vice*, #917700)
Ballard Spahr LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
Tel: (215) 665-8500; Fax: (215) 864-8999
johnl@ballardspahr.com
weisserte@ballardspahr.com

Jay Ward Brown (*pro hac vice*, #917699)
Ballard Spahr LLP
1909 K Street N.W., 12th Floor
Washington, D.C. 20006
Tel: (202) 661-2200; Fax: (202) 661-2299
brownjay@ballardspahr.com

Loretta Mince #25796
Fishman Haygood LLP
201 St. Charles Avenue, 46th Floor
New Orleans, Louisiana 70170
Tel: (504) 586-5252; Fax: (504) 586-5250
lmince@fishmanhaygood.com

Attorneys for The Associated Press

/s/ Jeffrey C. Bank

Jeffrey C. Bank (*pro hac vice*)
Allison B. Smith (*pro hac vice*)
Wilson Sonsini Goodrich & Rosati
1700 K Street, N.W., 5th Floor
Washington, D.C. 20006
Tel: (202) 973-8800; Fax: (202) 973-8899
jbank@wsgr.com
allison.smith@wsgr.com

Thomas M. McEachin #26412
Andrea V. Timpa #29455
William P. Gibbens #27225
Schonekas, Evans, McGoey
& McEachin, L.L.C.
909 Poydras Street, Suite 1600

/s/ John E. Schmidlein

John E. Schmidlein (*pro hac vice*, #917694)
Thomas G. Hentoff (*pro hac vice*, #917696)
Nicholas G. Gamse (*pro hac vice*, #917695)
Kathryn E. Garza (*pro hac vice*, #917697)
Williams & Connolly LLP
680 Maine Avenue, S.W.
Washington, D.C. 20024
Tel: (202) 434-5000; Fax: (202) 434-5029
jschmidlein@wc.com
thentoff@wc.com
ngamse@wc.com
kgarza@wc.com

Bernard S. Johnson #07280
Cook, Yancey, King & Galloway
333 Texas Street, Suite 1700 (71101)
P.O. Box 22260
Shreveport, Louisiana 71120-2260
Tel: (318) 221-6277; Fax: (318) 227-7850
bernard.johnson@cookyancey.com

*Attorneys for WP Company LLC
d/b/a The Washington Post*

New Orleans, Louisiana 70112
Tel: (504) 680-6050; Fax: (504) 680-6051
thomas@semmlaw.com
andrea@semmlaw.com
billy@semmlaw.com

Attorneys for Reuters News & Media Inc.

CERTIFICATE OF SERVICE

The undersigned Counsel hereby certifies that on the 11th day of July 2023, notice of the foregoing pleading was provided via the CM/ECF system to the counsel of record. In addition, notice was provided via email to the following counsel.

/s/ John E. Schmidlein

John E. Schmidlein

Edward B. Schwartz
Reed Smith LLP
1301 K Street, N.W.
Suite 1000, East Tower
Washington, D.C., 20005
Tel: (202) 414-9200
eschwartz@reedsmith.com

Michelle A. Mantine
Reed Smith LLP
Reed Smith Centre, 225
Fifth Avenue
Pittsburgh, PA, 15222
Tel: (412) 288-3131
mmantine@reedsmith.com

Casey J. Olbrantz
Reed Smith LLP
599 Lexington Avenue
New York, NY 10022
Tel: (212) 521-5400
colbrantz@reedsmith.com