

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARS, INCORPORATED)
6885 Elm Street)
McLean, Virginia 22101)
)
Plaintiff,)
)
v.)
)
COCOVAA, LLC)
1 Sherman Terrace, 102b)
Madison, Wisconsin 53704,)
)
and)
)
SYOVATA K. EDARI)
1 Sherman Terrace, 102b)
Madison, Wisconsin 53704)
)
Defendants.)

Case No. 17-CV-346

**MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION OR, IN THE
ALTERNATIVE, TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Please take notice that Defendants CocoVaa, LLC and Syovata K. Edari (collectively referred to herein as “Defendants”) hereby respectfully move this Court for an order dismissing the Complaint filed by Plaintiff Mars, Incorporated for lack of personal jurisdiction, as set forth in the accompanying Memorandum filed in support of this Motion. In the alternative, Defendants move this Court to enter an order transferring this case, in its entirety, to the Western District of Wisconsin, for the reasons set forth in greater detail in the accompanying Memorandum filed in support of this Motion.

Dated: May 15, 2017

Respectfully submitted,

/s/Cary Citronberg

Cary Citronberg (VA Bar # 81363)

ZWERLING/CITRONBERG

P.L.L.C.

114 North Alfred Street

Arlington, VA 22314

Telephone: (703) 684-8000

Facsimile: (703) 685-9700

cary@zwerling.com

Syovata K. Edari

(Appearing *Pro Hac Vice*)

Syovata K. Edari (WI Bar No.

1032283)

Law Office of Syovata Edari

2810 Crossroads Drive, Suite 4000

Madison, WI 53718

(414)779-0074

vata@edarilaw.com

CERTIFICATE OF SERVICE

I certify that counsel of record who are deemed to have consented to electronic service are being served on May 15, 2017 with a copy of this document via the Court's CM/ECF system.

Any other counsel will be served electronic mail, facsimile, overnight delivery and/or First Class Mail on this date.

Dated: May 15, 2017

/s/Cary Citronberg
Cary Citronberg
ZWERLING/CITRONBERG P.L.L.C.
114 North Alfred Street
Arlington, VA 22314
Telephone: (703) 684-8000
Facsimile: (703) 685-9700
cary@zwerling.com

Syovata K. Edari
(*Appearing Pro Hac Vice*)
Syovata K. Edari (WI Bar No. 1032283)
Law Office of Syovata Edari
2810 Crossroads Drive, Suite 4000
Madison, WI 53718
Telephone: (414)779-0074
Facsimile: 888-877-1325
vata@edarilaw.com