

**IN THE CIRCUIT COURT OF RAY COUNTY, MISSOURI
ASSOCIATE CIRCUIT DIVISION**

TROY CAPITAL, LLC,)
vs.)
Plaintiff/Counterclaim Defendant,) Case Number: 24RY-CV00372
vs.)
KACEY COLLIER, et al.,)
Defendants/Counterclaim Plaintiffs.)

DEFENDANTS' RULE 51.03 MOTION FOR CHANGE OF VENUE

COME NOW defendants/counterclaim plaintiffs, by and through undersigned counsel, and for their motion for Change of Venue, state as follows:

1. The initial return in this matter is scheduled for July 1, 2024.
2. Missouri Supreme Court Rule 51.03 provides for a Change of Venue as a Matter of Right in Counties of Seventy-five Thousand or Less Inhabitants “upon the filing of a written application therefor not later than ten days after answer is due to be filed”. Rule 51.03 (a).
3. Upon the timely filing of a Rule 51.03 Motion, the Court shall order the case transferred to “some other county convenient to the parties, first giving all parties the opportunity to make suggestions as to where the case should be sent.” Rule 51.03(c).
4. Defendants suggest that Jackson County, Missouri at Independence is the appropriate county for transfer as plaintiff has similar lawsuits pending in the Circuit Court of Jackson County, Missouri at Independence.

WHEREFORE, defendants/counterclaim plaintiffs respectfully request this Court grant their Motion for Change of Venue and transfer the case to Jackson County at Independence in accordance with the procedures of Rule 51.03(c).

Respectfully submitted,

LAW OFFICES OF MATT WILSON

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CERTIFICATE OF SERVICE

The undersigned certifies that on June 18, 2024 this document was filed electronically with the Court and served via the electronic filing system on all counsel of record.

/s/ Matt Wilson
Attorney for Defendants/Counterclaim Plaintiffs