

**BEFORE THE  
UNITED STATES JUDICIAL PANEL ON  
MULTIDISTRICT LITIGATION**

In Re Air crash at Muan International  
Airport, South Korea on December 29,  
2024

MDL- \_\_\_\_\_

**Motion of Defendant The Boeing Company for Transfer of Actions to the  
Northern District of Illinois Pursuant to 28 U.S.C. § 1407 for Coordinated or  
Consolidated Pretrial Proceedings**

The Boeing Company (“Boeing”) respectfully moves this Panel, pursuant to 28 U.S.C. § 1407, for transfer of the seven actions identified in the attached Schedule of Actions for coordinated or consolidated pretrial proceedings in the United States District Court for the Northern District of Illinois, or alternatively, in the United States District Court for the Western District of Washington. Centralization under Section 1407 is warranted because all of these actions arise out of the December 29, 2024, crash of Jeju Air Flight 7C2216 at the Muan International Airport in South Korea, they share common questions of fact, and they are pending in three different federal courts. Centralization would promote the just and efficient conduct of this litigation by preventing inconsistent resolution of common factual and legal issues, eliminating duplicative discovery, and conserving judicial resources.

In support of this Motion for Transfer, Boeing relies on the following facts as well as the facts and arguments presented in its concurrently filed Brief in Support.

**I. The actions arise out of a single aviation accident—the crash of Jeju Air Flight 7C2216 in South Korea.**

1. On December 29, 2024, Jeju Air Flight 7C2216 landed with its gear up at Muan International Airport, ran off the end of the runway, and crashed into a concrete berm, breaking into pieces and bursting into flames. 179 of the 181 individuals onboard died.

2. The seven separate actions that are the subject of this motion all arise from the crash of Jeju Air Flight 7C2216.

**II. The actions are pending in multiple federal district courts and name a common defendant.**

3. Three of the seven actions that are the subject of this motion are pending in the United States District Court for the Northern District of Illinois. These actions include three plaintiffs bringing claims relating to the deaths of three individuals who died in the Jeju Air Flight 7C2216 accident. The cases have all been assigned or reassigned to Judge Steven Seeger.

4. Another action is pending in the United States District Court for the Western District of Washington before Judge Robert Lasnik. This action involves 26 plaintiffs who are the family members of 14 individuals who died in the Jeju Air Flight 7C2216 accident.

5. Three other actions are pending in the United States District Court for the Eastern District of Virginia before Judge Rossie Alston, Jr. These cases involve three distinct plaintiffs who are the family members of six individuals who died in the Jeju Air Flight 7C2216 accident.

6. Additional suits could be filed by more plaintiffs on behalf of the remaining passengers and crew of Jeju Air Flight 7C2216 who are not represented by the actions filed to date.

7. Boeing is the only defendant in the Illinois and Virginia actions, while the Washington action includes both Boeing and unnamed “Roe” defendants.

**III. The actions raise common factual issues regarding the cause of the accident.**

8. Plaintiffs’ allegations raise common factual questions. All of the pending complaints (1) allege that Boeing defectively designed and manufactured the aircraft and its component parts, (2) seek to hold Boeing liable for passenger deaths, and (3) include claims based on negligence and product liability theories. Plaintiffs also claim that Boeing failed to provide adequate warnings. Plaintiffs’ allegations focus on many of the same aircraft systems, including the engines, electrical system, thrust reversers, flaps, spoilers, brakes, landing gear, and auxiliary power unit. Plaintiffs’ allegations raise common factual questions regarding the design and manufacture of these systems, and the related warnings.

9. The circumstances of the accident also raise common factual questions regarding the cause of the accident, including (1) the design, construction, and operation of Muan International Airport, including the concrete berm that the aircraft struck, (2) bird strike prevention at Muan International Airport, and (3) the functioning and maintenance of the accident aircraft.

**IV. The actions raise common threshold procedural and legal issues and transfer will avoid inconsistent rulings and promote the just and efficient conduct of the actions.**

10. The actions also raise a number of common threshold procedural and legal issues. First and foremost, as a threshold issue the court will need to decide whether under the doctrine of *forum non conveniens* these actions should be litigated in the United States or South Korea. Boeing has already moved to dismiss the Illinois actions on the grounds of *forum non conveniens* and will do so in the Washington and Virginia actions as well. Other common procedural and legal issues include the determination of which law applies to various issues; whether the actions fail to join necessary parties; and whether the actions are preempted by federal law. Centralization will ensure consistent rulings on these issues across all actions and will conserve judicial resources.

11. In the unlikely event that the cases remain in the United States, centralization will also “eliminate duplicative discovery, particularly with respect to potential international discovery; prevent inconsistent pretrial rulings; and conserve the resources of the parties, their counsel, and the judiciary.” *In re Air Crash over the S. Indian Ocean, on Mar. 8, 2014*, 190 F. Supp. 3d 1358, 1359 (J.P.M.L. 2016). Given the similarity of Plaintiffs’ claims against Boeing, including the overlap of aircraft systems that those allegations focus on, these cases will involve duplicative discovery regarding the design and manufacture of the accident aircraft. Factual questions related to the plaintiffs’ allegations in these actions will also require extensive and time-consuming international discovery regarding a number of issues, including (1) the design, construction, and maintenance of the concrete berm that was built at the end of the runway at the Muan Airport and that the accident aircraft struck; (2) the Muan Airport’s procedures, policies, and practices relating to bird strike prevention; and (3) the maintenance of the accident aircraft. Transfer for coordinated or consolidated proceedings would allow this discovery to proceed efficiently and without

duplication for all of the pending lawsuits. It would also help ensure consistency in how these factual issues are resolved and conserve the resources of the parties, their counsel, and the judiciary.

**V. Transfer to the Northern District of Illinois is warranted.**

12. In selecting a transferee district, the Panel considers a range of factors, which depend on the nature of the litigation. Among those factors are (1) which actions were first filed or are the most advanced, (2) the experience and expertise of the potential transferee courts, (3) the accessibility or central location of the transferee forum, (4) where the parties and counsel are located, and (5) where the majority of claims or cases are already pending. Here, the factors point to the Northern District of Illinois as the proper transferee district.

13. The first three factors strongly favor the Northern District of Illinois as the proper transferee district. First, the actions in the Northern District of Illinois were filed first and are the most advanced. Second, the Northern District of Illinois has significant experience managing MDLs, including multidistrict aviation litigation. Transfer to that forum will allow an able judge to preside over his first MDL and, if he is not available, the Northern District of Illinois has a deep bench of judges with significant experience handling complex multidistrict litigation, including multidistrict aviation litigation. Third, the Northern District of Illinois is the most geographically central U.S. forum.

14. Although most of the relevant factors favor the Northern District of Illinois, the Western District of Washington would also be an appropriate transferee court. First, the relevant Boeing witnesses are in the Western District of Washington. And although there is no district to which travel would be convenient for the numerous South Korean parties and witnesses, the Western District of Washington is the most accessible U.S. forum.<sup>1</sup> Second, although only one case has been filed in the Western District of Washington, it involves a majority of plaintiffs and

---

<sup>1</sup> As discussed in more detail in Boeing's Brief in Support, almost all, if not all of the damages witnesses are located in Korea. The majority of liability witnesses are also in Korea. Travel to any district in the U.S. from Korea is burdensome, which is why these cases should be dismissed on the grounds of *forum non conveniens*. But barring dismissal, the Western District of Washington is the easiest of the U.S. districts where cases are pending to reach from South Korea.

decedents. Third, the Western District of Washington has experience handling MDLs, though less than the Northern District of Illinois.

15. The other factors do not clearly favor any district. The parties are not geographically concentrated in any United States district. Plaintiffs and decedents in all of the cases are Korean residents and citizens. Boeing, on the other hand, is a Delaware corporation with its principal place of business in Virginia and a significant presence in Washington. Counsel for the parties are similarly diffuse. And because three cases are pending in each of the Northern District of Illinois and the Eastern District of Virginia, no jurisdiction has a majority of cases.

16. Ultimately, transfer to the Northern District of Illinois, where the actions are most advanced and which is the most centrally-located U.S. district, is appropriate.

WHEREFORE, The Boeing Company respectfully requests that the Judicial Panel on Multidistrict Litigation transfer the cases listed in the attached Schedule of Actions for coordinated or consolidated pretrial proceedings in the Northern District of Illinois.

Dated: November 19, 2025

**PERKINS COIE LLP**

By: /s/ Mack H. Shultz, Jr.  
Mack H. Shultz, WSBA No. 27190  
MShultz@perkinscoie.com  
**Perkins Coie LLP**  
1301 Second Avenue, Suite 4200  
Seattle, Washington 98101-3804  
Telephone +1.206.359.8000  
Facsimile +1.206.359.9000

*Attorney for The Boeing Company*