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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 LIBERTY MEDIA HOLDINGS LLC,
12 A Corporation,
13 Plaintiff,
14 v.
15 CARY TABORA, et al.
16 Defendants.

Case No. 11-CV0651 IEG JMA

**DEFENDANT CARY TABORA'S
MOTION TO DISMISS PLAINTIFF'S
SECOND AMENDED COMPLAINT
FOR LACK OF PERSONAL
JURISDICTION AND IMPROPER
VENUE**

Date: December 19, 2011
Time: 10:30 am
Courtroom: 1
Judge: Hon. Irma E. Gonzalez

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20 Defendant Cary Tabora hereby moves this Court to dismiss the above-entitled action
21 pursuant to Fed. R. Civ. P. 12(b)(2) and (3) for lack of personal jurisdiction and improper
22 venue.

23 This motion is brought on the grounds that the action must be dismissed because this
24 Court does not have general or specific jurisdiction over defendant and that venue is
25 improper.

26 This motion is based on the pleadings and papers on file in this action, this motion, the
27 Notice of Motion and Memorandum of Points and Authorities in Support Thereof filed
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1 concurrently herewith, the declaration of Cary Tabora, and such other and further evidence as
2 may be presented at a hearing on this motion.

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4 Dated: November 11, 2011

Respectfully submitted,

5
6 /s/ William Skinner
7 WILLIAM SKINNER (257139)
8 Attorney for Defendant
9 CARY TABORA
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