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

10
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

**NOTICE OF DEFENDANT CARY
TABORA'S MOTION TO DISMISS
PLAINTIFF'S SECOND AMENDED
COMPLAINT**

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

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20 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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22 PLEASE TAKE NOTICE that on December 19, 2011 at 10:30 AM or as soon
23 thereafter as the matter may be heard in Courtroom 1 of the United States Courthouse located
24 at 940 Front Street, San Diego, CA 92101, Defendant Cary Tabora will move the Court for an
25 order dismissing the above-entitled action on the grounds of lack of personal jurisdiction over
26 Defendant as well as improper venue.

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The motion is based upon the provisions of Fed. R. Civ. P. 12.

Dated: November 11, 2011

Respectfully submitted,

/s/ William Skinner
WILLIAM SKINNER (257139)
Attorney for Defendant
CARY TABORA