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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,

16 Defendant.

Case No. 11-CV0651 IEG JMA

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

Date: September 26, 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 declarations of Cary Tabora and William Skinner, and such other
2 and further evidence as may be presented at a hearing on this motion.

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Dated: August 16, 2011

Respectfully submitted,

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