

1 Scott Stuart Shogreen
7850 E Camelback Rd. Unit 211
2 Scottsdale, AZ 85251
Phone: 206.339.5651
3

4 **UNITED STATES DISTRICT COURT**

5 FOR THE

6 NORTHERN DISTRICT OF CALIFORNIA

7 THE REPUBLIC OF NICARAGUA,

8 Plaintiff,

9 vs.

Case No.: 3:24-CV-03104-MMC

10 THE LOPEZ-GOYNE FAMILY TRUST, GOYNE
11 FAMILY TRUST, THE BOCHNOWSKI FAMILY
12 TRUST, THE BARRIS FAMILY TRUST OF 2008,
HILLS EXPLORATION CORPORATION, ET AL

13 Defendant(s)

IN PRO PER MOTION TO DISMISS FOR LACK
OF JURISDICTION BY SCOTT STUART
SHOGREEN

Honorable Judge Maxine M. Chesney

14
15 **IN PRO PER MOTION TO DISMISS FOR LACK OF JURISDICTION BY SCOTT STUART SHOGREEN**

16
17 **MOTION TO DISMISS FOR LACK OF JURISDICTION**

18 1. Respondent Scott Stuart Shogreen, in pro per. moves to dismiss Nicaragua's Petition under Federal
19 Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction based on this Brief and Declaration and
20 rather than hold an evidentiary hearing this motion is based on the fact Petitioner cannot make a prima
21 facie showing of personal jurisdiction and jurisdiction over respondent Scott Stuart Shogreen is defeated
22 by respondent's within declaration.

23 Declaration of Respondent:

24
25 2. Declaration of Mr. Scott Stuart Shogreen:

26 **DECLARATION.**


27 I, Scott Stuart Shogreen hereby declare that the information given in this declaration and in the within
28 **IN PRO PER MOTION TO DISMISS FOR LACK OF JURISDICTION BY SCOTT STUART
SHOGREENHONORABLE JUDGE MAXINE M. CHESNEY - 1**

1 Motion is true to the best of my knowledge and belief and nothing has been concealed therein. I
2 understand that if the information given by me is proved false/not true, I will have to face the punishment
3 as per the law.

4
5 a. The allegation in the Petition by Nicaragua in paragraph p., line 20 on page 5 that "On information and
6 belief, Mr. Shogreen maintains contacts in this District" is not true. I have no contacts with California. I
7 have no incorporations in California. I am not physically present there. I have no domicile in California. I
8 have not consented to jurisdiction in California.

9
10 b. I have no minimum contacts with California and the maintenance of this Petition by Nicaragua against
11 me would offend traditional notions of fair play and substantial justice within the meaning of International
12 Shoe Co. v. Washington, 326 U.S. 310, 1946.

13
14 Signed on 6/21/2024 in Scottsdale, AZ by Scott Stuart Shogreen on information
15 and belief under penalty of perjury.

16
17 

18 (Scott Stuart Shogreen).

19
20 WHEREFORE, said respondent Scott Stuart Shogreen moves to dismiss the Petition filed by Nicaragua
21 for lack of jurisdiction.

22 Dated 6/21/2024

23
24 

25 Scott Stuart Shogreen, in pro per.

26 7850 E Camelback Rd. Unit 211

27 Scottsdale, AZ 85251

28 IN PRO PER MOTION TO DISMISS FOR LACK OF JURISDICTION BY SCOTT STUART
SHOGREENHONORABLE JUDGE MAXINE M. CHESNEY - 2