

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Monbo v. Fogle

Monbo · No. No. 25-cv-01788 (DLF) · Decided March 30, 2026

SUMMARY

The District Court for the District of Columbia granted Timothy Fogle’s motion to dismiss Deafueh Monbo’s copyright and trademark infringement claims for lack of personal jurisdiction. The court concluded that Fogle was not subject to general or specific jurisdiction in the District and dismissed the claims without prejudice under Federal Rule of Civil Procedure 12(b)(2).

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Dabney L. Friedrich
JURISDICTION	United States District Court for the District of Columbia
DECIDED	March 30, 2026
DOCKET	No. 25-cv-01788 (DLF)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss the copyright and trademark infringement action for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2).
STANDARD OF REVIEW	On a Rule 12(b)(2) motion, the plaintiff bears the burden of establishing a factual basis for personal jurisdiction. The court may receive and weigh affidavits and other relevant materials in determining jurisdictional facts.
PRECEDENTIAL VALUE	Published memorandum opinion of the United States District Court for the District of Columbia; no separate reporter or neutral citation appears in the source.

TOPICS

- personal jurisdiction
- motions to dismiss
- civil procedure
- copyright law
- trademark law

PRACTICE AREAS

- civil procedure
- personal jurisdiction
- intellectual property
- copyright
- trademark

QUESTIONS PRESENTED

1. Whether the District Court for the District of Columbia had general personal jurisdiction over Fogle.
2. Whether the court had specific personal jurisdiction over Fogle under D.C. Code § 13-423(a)(1) and constitutional due process.

HOLDINGS

1. The court lacked general personal jurisdiction over Fogle because Monbo alleged no continuous and systematic contacts with the District of Columbia; Fogle neither resided nor maintained his principal place of business there and had visited only once.
2. The court lacked specific personal jurisdiction over Fogle because Monbo failed to show that Fogle transacted business in the District of Columbia or otherwise had minimum contacts with the District relating to the claims.

KEY QUOTATIONS

“On such a motion, the plaintiff bears the burden of ‘establishing a factual basis for the exercise of personal jurisdiction’ over each defendant.” (at 2)

“A plaintiff seeking to establish specific jurisdiction over a non-resident defendant must establish that specific jurisdiction comports with the forum’s long-arm statute, D.C. Code § 13–423(a), and does not violate due process.” (at 4)

“On this record, the Court cannot conclude that it has specific jurisdiction over Fogle.” (at 5)

FACTUAL BACKGROUND

Monbo alleged that she co-owned a copyright in a logo associated with 12 O’Clock Boyz and owned common-law and registered trademark rights in the name “12 O’Clock Boyz.” Fogle, a Florida resident, owned a different registered design mark and operated a website and Facebook page associated with that mark, but attested that he had never sold goods bearing the logo and had not directed a third party to sell or advertise such goods. Monbo attempted to establish specific jurisdiction by purchasing an allegedly infringing shirt through Amazon and having it shipped to the District, but she did not connect the Amazon storefront or shirt to Fogle.

PROCEDURAL HISTORY

Monbo filed suit against Fogle in the District Court for the District of Columbia on June 6, 2025. Fogle moved to dismiss for lack of personal jurisdiction. The court granted the motion and dismissed the claims without prejudice.

DISPOSITION

dismissed

CASES CITED

- Triple Up Ltd. v. Youku Tudou Inc., 235 F. Supp. 3d 15, 20–21 (D.D.C. 2017)
- Crane v. N.Y. Zoological Soc’y, 894 F.2d 454, 456 (D.C. Cir. 1990)
- Shibeshi v. United States, 932 F. Supp. 2d 1, 2 (D.D.C. 2013)
- Second Amendment Foundation v. U.S. Conference of Mayors, 274 F.3d 521, 524 (D.C. Cir. 2001)
- Mallory v. Norfolk Southern Railway Co., 600 U.S. 122, 128–29 (2023)
- Lewis v. Full Sail, LLC, 266 F. Supp. 3d 320, 323 (D.D.C. 2017)
- Goodyear Dunlop Tires Operations, S.A. v. Brown, 564 U.S. 915, 919 (2011)
- Daimler AG v. Bauman, 571 U.S. 117, 125 (2014)
- Bristol-Myers Squibb Co. v. Superior Ct. of Cal., San Francisco Cnty., 582 U.S. 255, 262 (2017)
- Conant v. Wells Fargo Bank, N.A., 24 F. Supp. 3d 1, 12 (D.D.C. 2014)
- FC Investment Group LC v. IFX Markets, Ltd., 529 F.3d 1087, 1094–95 (D.C. Cir. 2008)
- Urquhart-Bradley v. Mobley, 964 F.3d 36, 44 (D.C. Cir. 2020)
- Crane v. Carr, 814 F.2d 758, 762 (D.C. Cir. 1987)