

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Alliant, LLC, a Wyoming limited liability company v. John “Esty” McCoy, an individual; Fluid Charge, LLC, a Dissolved Maryland limited liability company; Leesburg Pike Partners, LLC (Maryland), a Maryland limited liability company; Zach Lapole, an individual; Gage Evans, an individual; Christy Milton, an individual; and Tracer Payments, LLC, a Texas limited liability company

Alliant · No. 1:25-cv-00143-BLW · Decided May 1, 2026

SUMMARY

The United States District Court for the District of Idaho denied motions for attorneys’ fees filed by four defendants after the action was dismissed without prejudice for lack of personal jurisdiction. The court held that the defendants were not prevailing parties because the dismissal was an interim procedural victory that did not materially alter their legal relationship with the plaintiff. The court also denied the plaintiff’s request for sanctions under 28 U.S.C. § 1927 and the court’s inherent authority.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	B. Lynn Winmill
JURISDICTION	United States District Court for the District of Idaho
DECIDED	May 1, 2026
DOCKET	1:25-cv-00143-BLW
DISPOSITION	other
PROCEDURAL POSTURE	After dismissing the action without prejudice for lack of personal jurisdiction, the district court considered defendants’ post-dismissal motions for attorneys’ fees and plaintiff’s request for sanctions.
STANDARD OF REVIEW	The court exercised discretion under Idaho Rule of Civil Procedure 54(d)(1) to determine prevailing-party status and applied the statutory standard for sanctions under 28 U.S.C. § 1927.
PRECEDENTIAL VALUE	unpublished district court memorandum decision and order; persuasive only

TOPICS

attorney fees personal jurisdiction sanctions civil procedure commercial litigation

PRACTICE AREAS

civil procedure commercial litigation attorney fees sanctions personal jurisdiction

QUESTIONS PRESENTED

1. Whether the district court had authority to decide defendants' post-dismissal motions for attorneys' fees despite lacking personal jurisdiction over the moving defendants.
2. Whether defendants who obtained a without-prejudice dismissal for lack of personal jurisdiction were prevailing parties entitled to attorneys' fees under the applicable Idaho prevailing-party framework.
3. Whether the fee motions unreasonably and vexatiously multiplied the proceedings so as to warrant sanctions under 28 U.S.C. § 1927 or the court's inherent authority.

HOLDINGS

1. A federal district court may decide collateral attorneys' fee issues after dismissing an action for lack of personal jurisdiction over the defendants.
2. Defendants who obtain only a without-prejudice dismissal for lack of personal jurisdiction are not prevailing parties where the dismissal does not materially alter the parties' legal relationship and the plaintiff remains free to pursue the claims elsewhere.
3. Sanctions were unwarranted because defendants' unsuccessful fee arguments did not unreasonably and vexatiously multiply the proceedings, and the motions were not so unsound that a reasonably careful attorney would have avoided filing them.

KEY QUOTATIONS

"At this point, they have obtained nothing more than an interim procedural victory, based on Alliant's attempt to pursue its claims in the wrong forum."

"The moving defendants have not materially altered their legal relationship with Alliant."

FACTUAL BACKGROUND

The district court dismissed Alliant's claims without prejudice because it lacked personal jurisdiction over the defendants. The dismissal did not reach the merits, and Alliant remained free to refile in another jurisdiction. Defendants sought attorneys' fees on the theory that their jurisdictional dismissal made them prevailing parties, while Alliant sought sanctions based on the alleged lack of legal support for the fee motions.

PROCEDURAL HISTORY

The court previously granted all defendants' motions to dismiss for lack of personal jurisdiction, without prejudice. Defendants Gage Evans, Zach Lapole, Christy Milton, and Tracer Payments, LLC then moved for

attorneys' fees under Idaho law. Plaintiff Alliant opposed the fee motions and sought sanctions under 28 U.S.C. § 1927 and the court's inherent authority. The court denied all fee motions and denied the sanctions request.

DISPOSITION

other

CASES CITED

- B.C. v. Plumas Unified Sch. Dist., 192 F.3d 1260, 1264 (9th Cir. 1999)
- Bautista v. Park W. Gallery, 388 F. App'x 635, 636–37 (9th Cir. 2010)
- Legendz Entertainment, LLC v. Cam Specialty Lending 1, Ltd., No. 2:23-cv-03097-ODW, 2024 WL 4582874, at *2 (C.D. Cal. Oct. 25, 2024)
- Flick Mortg. Invs., Inc. v. Metropolis Promotion Invs. & Props. (1993), Ltd., No. 04-21900-CIV, 2007 WL 9710909, at *4 (S.D. Fla. Sept. 26, 2007)
- Alaska Rent-A-Car, Inc. v. Avis Budget Group, Inc., 738 F.3d 960 (9th Cir. 2013)
- Nguyen v. Bui, 191 P.3d 1107, 1112 (Idaho Ct. App. 2008)
- Blimka v. My Web Wholesaler, LLC, 152 P.3d 594, 597 (Idaho 2007)
- Charney v. Charney, 356 P.3d 355, 358 (Idaho 2015)
- Wealthy, Inc. v. Cornelia, No. 2:21-CV-1173 JCM (EJY), 2024 WL 5678984, at *2 (D. Nev. July 26, 2024)
- Joshco Tech., LLC v. Does 1-4, No. 2:20-cv-00521-JCM-EJY, 2020 WL 7696089, at *1 (D. Nev. Dec. 28, 2020)
- Stradtman v. Republic Servs., Inc., 121 F. Supp. 3d 578, 582, 585 (E.D. Va. 2015)