

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Global Reach, Inc. v. Hawkwood Group LLC

Civil Action No. 26-cv-1394 (BAH) (D.D.C. May 13, 2026) · No. Civil Action No. 26-cv-1394 (BAH) ·
Decided May 13, 2026

SUMMARY

The United States District Court for the District of Columbia grants Global Reach, Inc.’s motion for a temporary restraining order in its common-law tortious-interference action against Hawkwood Group LLC and Robert Kent. The court denies Kent’s motion to dismiss for lack of personal jurisdiction and improper venue. The dispute concerns alleged interference with Global Reach’s efforts to assist a U.S. citizen detained in Guinea.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Beryl A. Howell
JURISDICTION	United States District Court for the District of Columbia
DECIDED	May 13, 2026
DOCKET	Civil Action No. 26-cv-1394 (BAH)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order in an action alleging common-law tortious interference with business. Defendant Robert Kent moved to dismiss for lack of subject-matter jurisdiction, lack of personal jurisdiction, and improper venue. The court granted the temporary restraining order and denied Kent's motion to dismiss.
STANDARD OF REVIEW	For Rule 12(b)(1), the court accepted uncontroverted material allegations as true and construed the complaint liberally, while permitting consideration of materials outside the pleadings. For Rule 12(b)(2) without an evidentiary hearing, the plaintiff needed to make a prima facie showing of personal jurisdiction. A TRO required a clear showing of likelihood of success on the merits, irreparable harm, favorable balance of equities, and consistency with the public interest.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the jurisdiction but not binding appellate precedent.

TOPICS

torts personal jurisdiction venue injunctions civil procedure

PRACTICE AREAS

torts civil procedure remedies commercial litigation foreign affairs

QUESTIONS PRESENTED

1. Whether Hawkwood Group LLC could appear through its nonlawyer managing member, Robert Kent, acting pro se.
2. Whether the court had subject-matter jurisdiction based on diversity of citizenship and the amount in controversy.
3. Whether the District of Columbia could exercise personal jurisdiction over the out-of-state defendants under the District's long-arm statute and the Due Process Clause.
4. Whether venue was proper in the District of Columbia.
5. Whether Global Reach established the elements necessary for a temporary restraining order on its tortious-interference claim.

HOLDINGS

1. A nonlawyer may represent himself but may not represent a limited liability company in federal court; Hawkwood Group LLC therefore had not entered an appearance through qualified counsel.
2. The court had diversity jurisdiction because the parties were completely diverse and the amount in controversy exceeded \$75,000.
3. The court could exercise specific personal jurisdiction over defendants under the District of Columbia long-arm statute and the Due Process Clause.
4. Venue was proper in the District of Columbia because a substantial part of the events or effects giving rise to the claim occurred there, and the defendants were subject to personal jurisdiction there.
5. Global Reach established a substantial likelihood of success on its claim for tortious interference with business.
6. Global Reach satisfied the four requirements for a temporary restraining order, including likelihood of success, irreparable harm, favorable equities, and the public interest.

KEY QUOTATIONS

“an individual who is not an attorney cannot appear pro se and seek to represent others, but may only represent himself.” (20)

“Jurisdiction over petitioners is therefore proper in California based on the ‘effects’ of their Florida conduct in California.” (25)

“To state claims for tortious interference under District of Columbia law, a plaintiff must allege [1] the existence of a contract or business expectancy, [2] the defendant’s knowledge of the contract or business expectancy, [3] intentional interference causing the breach of the contract or termination of the business expectancy, and [4] damages.” (37)

“Deprivation of physical liberty by detention constitutes irreparable harm.” (40)

FACTUAL BACKGROUND

Global Reach, a Washington, D.C.-based nonprofit, was engaged by the fiancée of Fabio Nicolas Espinal Nuñez to assist in securing his lawful return from Guinea, where he had been detained after piloting a private aircraft. Hawkwood Group LLC and Robert Kent were separately engaged in connection with the detention of Nuñez's co-pilot and the aircraft, and allegedly pressured Nuñez to retain them, made disparaging and threatening statements, contacted officials and agencies, and disseminated social-media accusations linking Nuñez and his attorneys to criminal conduct. The court found that defendants' conduct allegedly interfered with Global Reach's engagement, contributed to the continuation of Nuñez's detention, and caused Global Reach more than \$94,000 in expenses.

PROCEDURAL HISTORY

Global Reach filed the complaint and a motion for a temporary restraining order on April 23, 2026. Kent filed pro se submissions purporting to appear for himself and Hawkwood Group LLC and seeking dismissal. The court construed those submissions as motions under Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(3), held a TRO hearing on May 1, 2026, permitted supplemental briefing, and resolved both motions in this memorandum opinion.

DISPOSITION

other

CASES CITED

- United States ex rel. Feliciano v. Ardoin, 127 F.4th 382, 392 (D.C. Cir. 2025) (per curiam)
- Rowland v. California Men's Colony, Unit II Men's Advisory Council, 506 U.S. 194, 201-02 (1993)
- American Airways Charters, Inc. v. Regan, 746 F.2d 865, 873 n.14 (D.C. Cir. 1984)
- Bronner ex rel. American Studies Ass'n v. Duggan, 962 F.3d 596, 602 (D.C. Cir. 2020)
- Hemp Industries Ass'n v. DEA, 36 F.4th 278, 281 (D.C. Cir. 2022)
- Crane v. New York Zoological Society, 894 F.2d 454, 456 (D.C. Cir. 1990)
- Mwani v. bin Laden, 417 F.3d 1, 6 (D.C. Cir. 2005)
- Calder v. Jones, 465 U.S. 783 (1984)
- Walden v. Fiore, Walden v. Fiore, 571 U.S. 277, 287 (2014)
- Banneker Ventures, LLC v. Graham, 798 F.3d 1119, 1134, 1136-37 (D.C. Cir. 2015)
- Raskauskas v. Temple Realty Co., 589 A.2d 17, 27 (D.C. 1991)

- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008)
- Hanson v. District of Columbia, 120 F.4th 223, 231 (D.C. Cir. 2024) (per curiam)
- In re Trump, 172 F.4th 44, 56 (D.C. Cir. 2026)
- Moore v. Cecil, 109 F.4th 1352, 1356-64 (11th Cir. 2024) (per curiam)
- Johnson v. Griffin, 85 F.4th 429, 431, 434-35 (6th Cir. 2023)

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