

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Covert v. Media Intercept, Inc.

Covert · No. 3:25-cv-00506-DKG · Decided April 24, 2026

SUMMARY

The United States District Court for the District of Idaho held that it lacked specific personal jurisdiction over Media Intercept, Inc. in Trevor Covert’s claims concerning unpaid commissions and expenses following his termination. The court concluded that Media’s employment of Covert, who worked remotely from Idaho, its participation in an Idaho unemployment proceeding, and isolated business dealings with an Idaho company did not establish sufficient purposeful contacts with Idaho. Rather than dismissing the action, the court transferred it to the United States District Court for the Middle District of Florida under 28 U.S.C. § 1631.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Debora K. Grasham
JURISDICTION	United States District Court for the District of Idaho
DECIDED	April 24, 2026
DOCKET	3:25-cv-00506-DKG
DISPOSITION	remanded
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(2) to dismiss the complaint for lack of personal jurisdiction and alternatively sought dismissal for improper venue or forum non conveniens, or transfer to the Middle District of Florida. The court denied dismissal and transferred the action under 28 U.S.C. § 1631.
STANDARD OF REVIEW	On a Rule 12(b)(2) motion based on written materials without an evidentiary hearing, the plaintiff must make a prima facie showing of jurisdictional facts. Uncontroverted allegations are taken as true, genuine disputes are resolved in the plaintiff's favor, and the court may consider evidence outside the pleadings; allegations contradicted by affidavit may not simply be assumed true.
PRECEDENTIAL VALUE	Unknown

TOPICS

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QUESTIONS PRESENTED

1. Whether the District of Idaho could exercise specific personal jurisdiction over Media Intercept, Inc. based on its employment relationship with an Idaho resident who worked remotely from Idaho, its payments and employment actions directed to Idaho, its participation in an Idaho unemployment proceeding, and isolated dealings with an Idaho company.
2. Whether, after finding personal jurisdiction lacking, the court should dismiss the action or transfer it to the Middle District of Florida under 28 U.S.C. § 1631.

HOLDINGS

1. Media Intercept did not have sufficient minimum contacts with Idaho to support specific personal jurisdiction. Covert's residence and remote work in Idaho, Media's knowledge of those facts, its hiring and termination of Covert there, payments to him there, participation in his Idaho unemployment claim, and isolated dealings with Kit, Inc. did not establish purposeful availment or purposeful direction toward Idaho.
2. When a federal court lacks jurisdiction, 28 U.S.C. § 1631 authorizes transfer rather than dismissal when transfer is in the interest of justice and the action could have been brought in the transferee court. Transfer to the Middle District of Florida was warranted here.

KEY QUOTATIONS

“However, the plaintiff cannot be the only link between the defendant and the forum.”

“That Covert chose to work from Idaho does not demonstrate that Media purposefully availed itself of the privilege of conducting business in Idaho.”

“The interest of justice warrants transferring the case to the Middle District of Florida to allow Covert an opportunity to pursue his claims on their merits in the proper jurisdiction, rather than dismissal.”

FACTUAL BACKGROUND

Covert, an Idaho resident, worked remotely from Idaho as Media Intercept's Director of Sales beginning in June 2023 and was terminated in approximately April 2025. Media is incorporated and headquartered in Florida, with its sole office, employment records, payroll operations, and supervising manager located there. Media had no Idaho office, property, bank account, clients, employees after Covert's termination, marketing operations, or registration to do business in Idaho, although Covert worked from Idaho, received payments there, participated in an Idaho unemployment proceeding, and identified isolated dealings between Media and Idaho-based Kit, Inc.

PROCEDURAL HISTORY

Trevor Covert filed a diversity action in the District of Idaho asserting state-law claims arising from unpaid commissions and expenses after his termination by Media Intercept, Inc. Media moved to dismiss for lack of personal jurisdiction and alternatively sought dismissal or transfer. The court concluded that specific personal jurisdiction over Media was lacking in Idaho but determined that the interest of justice warranted transfer to the Middle District of Florida rather than dismissal.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The Clerk was directed to transfer the case to the United States District Court for the Middle District of Florida, Orlando Division, under 28 U.S.C. § 1631. The action was to proceed in the transferee court as if filed there on the original filing date.

CASES CITED

- S.E.C. v. Ross, 504 F.3d 1130, 1138 (9th Cir. 2007)
- Mavrix Photo, Inc. v. Brand Technologies, Inc., 647 F.3d 1218, 1223 (9th Cir. 2011)
- Yamashita v. LG Chem, Ltd., 62 F.4th 496, 502 (9th Cir. 2023)
- Doe v. Unocal Corp., 248 F.3d 915, 922 (9th Cir. 2001)
- LNS Enterprises LLC v. Continental Motors, Inc., 22 F.4th 852, 858 (9th Cir. 2022)
- Ayla, LLC v. Alya Skin Pty. Ltd., 11 F.4th 972, 978 (9th Cir. 2021)
- Data Disc, Inc. v. Systems Technology Associates, Inc., 557 F.2d 1280, 1284 (9th Cir. 1977)
- Yahoo! Inc. v. La Ligue Contre Le Racisme, 433 F.3d 1199, 1205 (9th Cir. 2006) (en banc)
- Panavision International, L.P. v. Toeppen, 141 F.3d 1316, 1320 (9th Cir. 1998)
- International Shoe Co. v. State of Washington, International Shoe Co. v. State of Washington, Office of Unemployment Compensation & Placement, 326 U.S. 310, 316 (1945)
- Doe v. Deutsche Lufthansa, 157 F.4th 1103, 1109 (9th Cir. 2025)
- Davis v. Cranfield Aerospace Solutions, Ltd., 71 F.4th 1154, 1161-1162 (9th Cir. 2023)
- Lake v. Lake, 817 F.2d 1416, 1420 (9th Cir. 1987)
- Doggett v. Electronics Corp. of America, 454 P.2d 63, 67 (Idaho 1969)
- Ford Motor Co. v. Montana Eighth Judicial District Court, 141 S. Ct. 1017, 1024 (2021)
- Ratha v. Phatthana Seafood Co., 35 F.4th 1159, 1171 (9th Cir. 2022)
- Walden v. Fiore, Walden v. Fiore, 571 U.S. 277, 283-290 (2014)
- Keeton v. Hustler Magazine, Inc., 465 U.S. 770, 774 (1984)
- Shaffer v. Heitner, 433 U.S. 186, 204 (1977)
- Burger King Corp. v. Rudzewicz, Burger King Corp. v. Rudzewicz, 471 U.S. 462, 474-478 (1985)
- Briskin v. Shopify, Inc., 135 F.4th 739, 750-751 (9th Cir. 2025)
- Schwarzenegger v. Fred Martin Motor Co., 374 F.3d 797, 802-803 (9th Cir. 2004)

- Impossible Foods Inc. v. Impossible X LLC, 80 F.4th 1079, 1088-1089 (9th Cir. 2023)
- Ballard v. Savage, 65 F.3d 1495, 1498 (9th Cir. 1995)
- Global Commodities Trading Group, Inc. v. Beneficio de Arroz Choloma, S.A., 972 F.3d 1101, 1107 (9th Cir. 2020)
- Cox v. Gritman Medical Center, 2026 WL 738569, at *5 (9th Cir. Mar. 16, 2026)
- Van Hook v. Crete Carrier Corp., 2025 WL 1643098, at *4 (D. Idaho June 10, 2025)
- Alliant, LLC v. McCoy, 2026 WL 18808, at *7-8 (D. Idaho Jan. 2, 2026)
- Boschetto v. Hansing, 539 F.3d 1011, 1016 (9th Cir. 2008)
- Pebble Beach Co. v. Caddy, 453 F.3d 1151, 1155 (9th Cir. 2006)
- Miller v. Hambrick, 905 F.2d 259, 262 (9th Cir. 1990)
- Christianson v. Colt Industries Operating Corp., 486 U.S. 800, 818 (1988)
- Amity Rubberized Pen Co. v. Market Quest Group, Inc., 793 F.3d 991, 996 (9th Cir. 2015)
- Tisher v. Boeing Co., 2026 WL 982883, at *12-13 (D. Or. Apr. 13, 2026)
- Asbury v. Stout, 2025 WL 1906707, at *10 n. 9 (M.D. Fla. July 10, 2025)
- Alliant, LLC v. McCoy, 2026 WL 18808, at *11 (D. Idaho Jan. 2, 2026)
- Lewis v. Abbot Laboratories, Inc., 2020 WL 631595, at *10 (M.D. Fla. Feb. 5, 2020), recommendation adopted, 2020 WL 998717 (M.D. Fla. Mar. 2, 2020)

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