

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Green Jeeva LLC v. Lokesh Pathak, et al.

Green Jeeva · No. 2:25-CV-1122 JCM (DJA) · Decided January 9, 2026

SUMMARY

The United States District Court for the District of Nevada considered motions to dismiss filed by Lokesh Pathak and Mclob America, LLC in a trade-secret and related commercial dispute. The court concluded that the pleadings did not establish general or specific personal jurisdiction in Nevada, but determined that limited jurisdictional discovery was warranted regarding the defendants’ business activities and travel to Nevada. The court allowed jurisdictional discovery through April 9, 2026 and deferred ruling on the defendants’ Rule 12(b)(3) and Rule 12(b)(6) arguments.

CASE DETAILS

COURT	United States District Court for the District of Nevada
JURISDICTION	United States District Court for the District of Nevada
DECIDED	January 9, 2026
DOCKET	2:25-CV-1122 JCM (DJA)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought federal and state trade-secret and related claims against Lokesh Pathak, Mclob America, LLC, and Mclob USA, LLC. Pathak and Mclob America moved to dismiss under Federal Rule of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6). The court granted limited jurisdictional discovery, deferred ruling on the motions to dismiss, and set a schedule for supplemental briefing.
STANDARD OF REVIEW	On a Rule 12(b)(2) motion without an evidentiary hearing, the plaintiff need only make a prima facie showing of personal jurisdiction. Uncontroverted allegations are accepted as true, factual disputes in affidavits are construed in the plaintiff’s favor, and the court has discretion whether to allow jurisdictional discovery.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- personal jurisdiction
- discovery dispute
- motions to dismiss
- trade secrets
- civil procedure

PRACTICE AREAS

civil procedure

personal jurisdiction

trade secrets

commercial litigation

intellectual property

QUESTIONS PRESENTED

1. Whether the allegations and evidence established general personal jurisdiction over Pathak and Mclob America in Nevada.
2. Whether the allegations and evidence established specific personal jurisdiction over Pathak and Mclob America under the Ninth Circuit's purposeful-direction and Calder effects analysis.
3. Whether Green Jeeva was entitled to jurisdictional discovery before the court ruled on the motions to dismiss.

HOLDINGS

1. The court lacked general personal jurisdiction in Nevada over Pathak and Mclob America because the record did not show continuous and systematic contacts rendering either defendant essentially at home in Nevada.
2. Green Jeeva did not establish the first prong of the Ninth Circuit's specific-jurisdiction test because the allegations and evidence did not plausibly show that Pathak or Mclob America expressly aimed their conduct at Nevada.
3. The court granted limited jurisdictional discovery concerning defendants' business activities and travel to Nevada, but denied discovery into five years of communications between defendants and Green Jeeva.

KEY QUOTATIONS

“For a court to exercise personal jurisdiction over a nonresident defendant, that defendant must have at least ‘minimum contacts’ with the relevant forum such that the exercise of jurisdiction ‘does not offend traditional notions of fair play and substantial justice.’” (Section II)

“Jurisdictional discovery should ordinarily be granted where pertinent facts bearing on the question of jurisdiction are controverted or where a more satisfactory showing of the facts is necessary.” (Section III.C)

“a mere hunch that discovery might yield jurisdictionally relevant facts, or bare allegations in the face of specific denials, are insufficient reasons for a court to grant jurisdictional discovery.” (Section III.C)

FACTUAL BACKGROUND

Lokesh Pathak, who resides in India, worked for an India-based sister company of Green Jeeva from 2017 to 2021 and allegedly had access to Green Jeeva's trade secrets and proprietary ERP software. Green Jeeva alleges that Pathak later cloned the software, diverted customers, and disclosed trade secrets to Mclob America and Mclob USA, California entities with which Pathak was associated. Green Jeeva identified four Nevada-based customers allegedly purchasing from defendants, but the court found that the record did not establish that defendants expressly targeted Nevada or maintained ongoing relationships with those customers.

PROCEDURAL HISTORY

Green Jeeva filed suit alleging trade-secret misappropriation and related claims arising from the alleged copying and use of its proprietary ERP software and customer information. After Mclob USA failed to respond, the clerk entered default against it on October 10, 2025. Pathak and Mclob America separately moved to dismiss, and the court ordered limited jurisdictional discovery concerning their business activities and travel to Nevada before deciding the dismissal motions.

DISPOSITION

other

CASES CITED

- *Boschetto v. Hansing*, 539 F.3d 1011 (9th Cir. 2008)
- *Rio Properties, Inc. v. Rio International Interlink*, 284 F.3d 1007, 1019 (9th Cir. 2002)
- *Bancroft & Masters, Inc. v. Augusta National, Inc.*, 223 F.3d 1082, 1087 (9th Cir. 2000)
- *Schwarzenegger v. Fred Martin Motor Co.*, 374 F.3d 797, 801-02, 805 (9th Cir. 2004)
- *International Shoe Co. v. State of Washington*, *International Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945)
- *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 413-16 (1984)
- *LSI Industries, Inc. v. Hubbell Lighting, Inc.*, 232 F.3d 1369, 1375 (Fed. Cir. 2000)
- *In re Western States Wholesale Natural Gas Litigation*, 605 F. Supp. 2d 1118, 1131 (D. Nev. 2009)
- *Daimler AG v. Bauman*, 571 U.S. 117, 137 (2014)
- *Tuazon v. R.J. Reynolds Tobacco Co.*, 433 F.3d 1163, 1171 (9th Cir. 2006)
- *Avus Designs, Inc. v. Grezxx, LLC*, 644 F. Supp. 3d 963, 978 (D. Wyo. 2022)
- *Allen v. IM Solutions, LLC*, 83 F. Supp. 3d 1196, 1204 (E.D. Okla. 2015)
- *Talentscale, Inc. v. Aery Aviation, LLC*, No. 5:25-mc-1-TKW/MJF, 2025 U.S. Dist. LEXIS 229348, at *8 (N.D. Fla. Oct. 17, 2025)
- *Menken v. Emm*, 503 F.3d 1050, 1059 (9th Cir. 2007)
- *Travelers Health Association v. Virginia*, 339 U.S. 643, 648 (1950)
- *Burger King Corp. v. Rudzewicz*, *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 475-76 (1985)
- *Walden v. Fiore*, *Walden v. Fiore*, 571 U.S. 277, 1122, 1124-25 (2014)
- *Axiom Foods, Inc. v. Acerchem International, Inc.*, 874 F.3d 1064, 1070 (9th Cir. 2017)
- *Wells Fargo & Co. v. Wells Fargo Express Co.*, 556 F.2d 406, 430 n.24 (9th Cir. 1977)
- *Yamashita v. LG Chem, Ltd.*, 62 F.4th 496, 507 (9th Cir. 2023)