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Harrison, AR 72601

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

DAVID STEBBINS,

PLAINTIFF

VS.

Case 4:23-cv-00321-DMR

SYDNEY REDFIELD, d.b.a. SIDALPHA

DEFENDANTS

**MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION**

Comes now, pro se Plaintiff David Stebbins, who hereby submits the following Motion for Leave to File Motion for Reconsideration in the above-styled action.

1. One of the grounds for seeking reconsideration is “A manifest failure by the Court to consider material facts or dispositive legal arguments which were presented to the Court before such interlocutory order.” See Local Rule 7-9(b)(3).
2. In Dkt. 22, the Court rejected my arguments that SidAlpha has established personal jurisdiction in the Northern District of California simply by dint of him posting the video in California. However, I also provided a slew of other arguments for personal jurisdiction which the Court manifestly failed to give any consideration to. Among these arguments include, but are not limited to:
  - (a) The Defendant conducts substantial business in California. See Dkt. 17, ¶¶ 11-19.
  - (b) My reputational injury was felt primarily in California. See Dkt. 17, ¶¶ 20-33.
  - (c) A good portion of the allegedly-wrong conduct that Redfield defamed me over occurred in California. See Dkt. 17, ¶¶ 34-36.
  - (d) The Defendant's video was distributed in California, just like Hustler Magazine was distributed in New Hampshire. See Dkt. 17, ¶¶ 37-48.
  - (e) The Defendant used California sources to create his smear video. See Dkt. 17, ¶¶ 49-51.
3. All of these factors are relevant considerations under the precedents of *Calder v. Jones* and *Keeton v. Hustler*. Any one of these should be singlehandedly sufficient to create personal

jurisdiction in this Court. And yet, the Court gave precisely zero consideration to these claims.

4. For this reason, I ask the Court to grant me leave to file a motion for reconsideration so that these arguments may be properly addressed by the Court.

5. So requeste don this, the 15<sup>th</sup> day of November, 2023.

/s/ David Stebbins  
David Stebbins (pro se)