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Attorneys for Defendant QUANTUM
FUTURE GROUP, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

HIGHER BALANCE, LLC, an Oregon
Limited Liability Company, dba the HIGHER
BALANCE INSTITUTE,

Plaintiff,

vs.

QUANTUM FUTURE GROUP, INC., a
California corporation, QUANTUM FUTURE
SCHOOL, SIGNS OF THE TIMES, and
LAURA KNIGHT-JADCZYK,

Defendants.

CASE NO. 3:08-cv-233 - HA

**Defendant Quantum Future Group, Inc.'s
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Pursuant to Fed. R. Civ. P. 12(b)(2)

(Request for Oral Argument)

L.R. 7.1(a) CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(a), on April 23, 2008, Stephen Kaus, counsel for defendant, spoke with plaintiff's counsel, Kevin Hughey, and requested that plaintiff dismiss its claims against

defendant for lack of personal jurisdiction. The parties made a good faith effort but were unable to resolve the dispute.

MOTION

Defendant Quantum Future Group, Inc. ("QFG") moves pursuant to Fed. R. Civ. P. 12(b)(2) to dismiss all of plaintiff's claims against it on the ground that this Court lacks personal jurisdiction.

QFG is a California non-profit corporation with its principal place of business in France. QFG has no employees at all, and has no officers or directors, offices or any assets in Oregon. QFG does no significant business in Oregon. Defendant does not purposefully direct any of its activities specifically at either Oregon or her residents, nor has defendant otherwise purposefully availed itself of the benefits and protections of the laws of Oregon. In short, defendant does not have the Constitutionally-mandated "minimum contacts" with Oregon that will support the exercise of personal jurisdiction over defendant consistent with Due Process. Accordingly, plaintiff's claims against defendant should be dismissed for lack of personal jurisdiction.

This motion is supported by defendant's Memorandum; the Declarations of Laura Knight-Jadczyk and Stephen Kaus in Support of Defendant's Motion to Dismiss for Lack of Personal Jurisdiction; and such other documents and files as the Court may consider.

Dated this 25th day of April, 2008.

COOPER, WHITE & COOPER LLP

By: 

Stephen Klaus (appearing *pro hac vice*)
Attorneys for Defendant QUANTUM
FUTURE GROUP, INC.

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