

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
PENNSYLVANIA**

CHRISTOPHER J. HADNAGY,
individually and on behalf of
SOCIAL-ENGINEER, LLC,

Plaintiffs,

v.

JEFF MOSS, and
DEF CON COMMUNICATIONS,
INC.,

Defendants.

No. 2:22-cv-03060-WB

Defendants' Motion to Dismiss for
Lack of Personal Jurisdiction and
Failure to State a Claim

Oral Argument Requested

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) and for the reasons stated in the accompanying Memorandum of Law, which is incorporated here as though fully set forth, Defendants Jeff Moss and DEF CON Communications, Inc. respectfully request that all claims against them in the Complaint be dismissed for lack of personal jurisdiction. Alternatively, if the Court concludes that there is personal jurisdiction over Defendants, Defendants respectfully request that all claims against them in the Complaint be dismissed with prejudice.

Date: October 11, 2022

By: /s/ Matt Mertens
Matthew Mertens (admitted PHV)
PERKINS COIE LLP

1120 NW Couch Street, 10th Floor
Portland, Oregon 97209-4128
503.727.2199
MMertens@perkinscoie.com

David Perez (admitted PHV)
PERKINS COIE LLP
1201 Third Avenue
Suite 4900
Seattle, Washington 98101-3099
206.359.6767
DPerez@perkinscoie.com

By: /s/ Jonathan L. Cochran
Jonathan L. Cochran
John S. Stapleton
**LeVAN STAPLETON SEGAL
COCHRAN LLC**
One Liberty Place
1650 Market Street, Suite 3600
Philadelphia, PA 19103
215.261.5210
jcochran@levanstapleton.com

*Counsel for Defendants Jeff Moss and
DEF CON Communications, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2022, I caused a true and correct copy of the foregoing *Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Failure to State a Claim* to be served via CM/ECF filing upon counsel for all parties.

/s/ Jonathan L. Cochran

Jonathan L. Cochran