

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

**MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
(City of St. Louis)**

FILED
DEC 27 2017

22ND JUDICIAL CIRCUIT
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BY _____ DEPUTY

ST. LOUIS REGIONAL)
CONVENTION AND SPORTS)
COMPLEX AUTHORITY, et al.,)
) No. 1722-CC00976
Plaintiffs,)
) Division No. 21
vs.)
)
NATIONAL FOOTBALL LEAGUE,)
et al.,)
)
Defendants.)

ORDER

The Court has before it the Motion by "Out of State Defendants" to Dismiss Plaintiffs' Claims Against Them For Lack of Personal Jurisdiction. The Court now rules as follows.

In this motion, 85 of the 90 Defendants- all but the National Football League, the Los Angeles Rams, Rams' owner E. Stanley Kroenke, the Kansas City Chiefs, and Chiefs' owner Clark Hunt, move to dismiss Plaintiffs' claims for lack of personal jurisdiction.

Plaintiffs allege that personal jurisdiction exists over the "Out of State Defendants" in that all Defendants have knowingly caused injury in Missouri to Missouri Plaintiffs and have had systemic and continuous contacts with Missouri. Defendants play

football contests in Missouri, and share revenue generated from teams and games in Missouri.

It is Plaintiffs' burden to allege facts to demonstrate (1) that each defendant "had sufficient minimum contacts with this state to satisfy due process requirements" and (2) that their alleged harm "arose out of an activity covered by Missouri's long-arm statute." Johnson Heater Corp. v. Deppe, 86 S.W.3d 114, 119 (Mo.App. E.D. 2002). Clearly, this standard is met. The minimum contacts requirement is met "if the defendant has purposefully directed his activities at residents of the forum... and the litigation results from alleged injuries that arise out of or relate to those activities." Calder v. Jones, 465 U.S. 783 (1984). Regarding Plaintiffs' allegations of fraud, it is settled that where a defendant knowingly sends into a state a false statement, intending that it should there be relied upon to the injury of a resident of that state, he has, for jurisdictional purposes, acted within that state. Bryant v. Smith Interior Design Grp., Inc., 310 S.W.3d 227, 234 (Mo. banc 2010). Additionally, the commission of an extraterritorial act which produces actionable consequences in this state will support personal jurisdiction in Missouri. Capitol Indem. Corp. v. Citizens Nat'l Bank of Fort Scott, 8 S.W.3d 893, 903 (Mo.App. W.D. 2000).

Plaintiffs allege that the Relocation Policy imposes obligations on Defendants that are intended to benefit St. Louis. Plaintiffs allege that Defendants failed to satisfy their obligations under the Relocation Policy, causing injury to the Plaintiffs. The injury alleged in this case, to the City of St. Louis, St. Louis County, and the St. Louis Regional Convention and Sports Complex Authority, obviously occurred in Missouri. This is a clear case of the Missouri long-arm statute operating to hold Defendants amenable to suit in Missouri for injuries they caused in Missouri.

THEREFORE, it is Ordered and Decreed that the Motion by "Out of State Defendants" to Dismiss Plaintiffs' Claims Against Them For Lack of Personal Jurisdiction is DENIED.

SO ORDERED:

CHRISTOPHER MCGRAUGH, Judge

Dated: December 27, 2017

FILED

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