

PITT v. SHEFLER

(2026) DJDAR 5211

Court of Appeal, Second District, California

Courts can have specific personal jurisdiction over foreign litigants if there is sufficient contact with the forum, even if negotiations occur abroad.

FACTS/PROCEDURE

In 2008, Pitt and Jolie (Mr. and Mrs. Smith) purchased a French vineyard named Château Miraval together. Both Pitt and Jolie formed their respective LLCs that owned 50% interest in the vineyard. After the divorce, Jolie sold her LLC to Tenute Del Mondo, a Dutch company owned by Yuri Shefler. The purchase agreement was governed by California law with a California forum-selection clause. As a result of the sale, Pitt became an unwilling partner of Shefler.

Pitt filed a suit in Los Angeles Superior Court against Jolie, Shefler, and other related entities. The suit alleged tortious interference with contractual relations and prospective business relations. In response, Shefler moved to quash the service of summons for lack of personal jurisdiction. In the motion to quash, Shefler argued that he was a resident of Switzerland who did not participate in the negotiations nor have substantial contacts with California.

The trial court granted the motion, finding that Pitt failed to show by a preponderance of evidence that Shefler purposefully availed himself to the California forum. Pitt timely appealed.

HOLDING/DISCUSSION

The Second District Court of Appeal reversed, holding that specific personal jurisdiction is present. The Court reiterated the specific jurisdiction test, which requires that: (1) the defendant has “purposefully availed himself of the forum benefits”; (2) the controversy is related to or arises out of the defendant’s contacts with the forum; and (3) the assertion of personal jurisdiction would comport with “fair play and substantial justice.” (*Ford Motor Co. v. Montana Eighth Judicial District Court* (2021) 592 U.S. 351, 358 [citing *International Shoe Co. v. Washington* (1945) 326 U.S. 310, 316-317].)

Here, the first prong is the biggest point of contention. The Court found that there is substantial contact between Shefler and California. In support, the Court pointed to Shefler’s extensive role in his company and the negotiations for the vineyard. Specifically, Shefler has repeatedly referred to Tenute as “his company,” continuously communicated with Jolie to facilitate the transaction, and even pledged \$39 million of his personal funds as payment guarantee to Jolie.

Shefler’s argument that negotiations occurred primarily outside of California was found by the Court to be unpersuasive. The Court also rejected Shefler’s attempt to analogize the present case to *Walden v. Fiore* (2014) 571 U.S. 277 [no personal jurisdiction for Atlanta Airport police officer who seized passenger’s cash during their layover to Nevada]. The Court distinguished the present case from *Walden*, stating that Shefler had extensive contacts with California through contacting individuals, directing others

to contact, and sending payments. As a result, Shefler has purposefully availed himself of the California forum for its benefits.

Additionally, the Court also held that Shefler's oversight and involvement in the acquisition of the vineyard satisfied the "arising out of" requirement of the second prong. The third prong is also satisfied because Shefler did not present any evidence that showed litigation in California would be "so gravely difficult" that the defendant would be at a "severe disadvantage." (*Vons Companies, Inc. v. Seabest Foods, Inc.* (1996) 14 Cal.4th 434, 447.)

Trial court's order granting Shefler's motion to quash is reversed. Pitt is to recover costs on appeal.