

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

Anna Fernandez Willis v. Riley Herbert Willis, III

Willis v. Willis · No. 2:25-cv-00333-LEW · Decided March 24, 2026

SUMMARY

The United States District Court for the District of Maine dismissed the plaintiff’s assault-related action without prejudice for lack of personal jurisdiction. The court held that the defendant’s alleged conduct occurred in Alabama, and the plaintiff’s subsequent move to Maine and resulting injuries there did not establish sufficient contacts or foreseeability for Maine jurisdiction.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                              |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Maine                                                                                                                                                                                                                                                                                       |
| WRITING FOR THE COURT | Lance E. Walker                                                                                                                                                                                                                                                                                                                              |
| JURISDICTION          | United States District Court for the District of Maine                                                                                                                                                                                                                                                                                       |
| DECIDED               | March 24, 2026                                                                                                                                                                                                                                                                                                                               |
| DOCKET                | 2:25-cv-00333-LEW                                                                                                                                                                                                                                                                                                                            |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | Plaintiff moved for default judgment after Defendant failed to appear or respond. The court ordered Plaintiff to show cause why the clerk's previously entered default should not be vacated, held an evidentiary hearing concerning service and jurisdiction, and dismissed the action without prejudice for lack of personal jurisdiction. |
| STANDARD OF REVIEW    | Before entering default judgment, the court independently must ensure that it has personal jurisdiction over the defendant; a default judgment entered without personal jurisdiction is void.                                                                                                                                                |
| PRECEDENTIAL VALUE    | unpublished district court order                                                                                                                                                                                                                                                                                                             |
| PARTIES               | Anna Fernandez Willis v. Riley Herbert Willis, III                                                                                                                                                                                                                                                                                           |

TOPICS

- personal jurisdiction
- default judgment
- service of process
- civil procedure
- torts

PRACTICE AREAS

- civil procedure
- personal jurisdiction
- default judgment
- torts

## QUESTIONS PRESENTED

1. Whether the court could enter default judgment without first establishing personal jurisdiction over Defendant.
2. Whether Defendant had sufficient minimum contacts with Maine under Maine's long-arm statute and the Due Process Clause to support personal jurisdiction.
3. Whether Plaintiff's subsequent move to Maine, anticipated medical consequences there, and family ties to Maine established that Defendant could reasonably anticipate being sued in Maine.

## HOLDINGS

1. Before granting default judgment, the court has an affirmative duty to ensure that it possesses personal jurisdiction over the absent defendant; a default judgment entered without personal jurisdiction would be void.
2. Maine lacked personal jurisdiction over Defendant because the alleged tortious conduct occurred in Alabama, the parties resided there when it occurred, and Plaintiff's subsequent move to Maine did not establish that Defendant purposefully established contacts with Maine or could reasonably anticipate being sued there.

## KEY QUOTATIONS

*“Before granting default judgment, the Court has ‘an affirmative duty’ to ensure that it has jurisdiction ‘over both the subject matter and the parties.’”* (unpaginated order)

*“A default judgment entered by a court which lacks jurisdiction over the person of the defendant is void[.]”* (unpaginated order)

*“The commission outside the forum state of an act that has consequences in the forum state is by itself an insufficient contact where all the events necessary to give rise to a tort claim occurred outside the forum state.”* (unpaginated order)

*“Without anything more to connect the Defendant to this forum, I cannot conclude that he “could reasonably anticipate being haled into court in Maine.””* (unpaginated order)

## FACTUAL BACKGROUND

Plaintiff and Defendant were married and resided together in Alabama in August 2023 when Defendant allegedly doused Plaintiff with accelerant and set her on fire. Plaintiff later moved to Maine, while Defendant remained incarcerated in Alabama awaiting trial on criminal charges related to the incident. The alleged tortious conduct and the parties' residence at the time occurred in Alabama, and the court found no sufficient connection between Defendant and Maine.

## PROCEDURAL HISTORY

Plaintiff filed an action arising from an alleged 2023 assault. After Defendant failed to respond, the clerk entered default and Plaintiff moved for default judgment. The court identified irregularities concerning service and

jurisdiction, ordered a show-cause response, conducted an evidentiary hearing, and dismissed the complaint without prejudice because personal jurisdiction was lacking.

## DISPOSITION

dismissed

## CASES CITED

- Strike 3 Holdings, LLC v. Doe, 757 F. Supp. 3d 99, 103 (D. Mass. 2024)
- Estate of Ungar & Ungar ex rel. Strachman v. Palestinian Authority, 325 F. Supp. 2d 15, 45 (D.R.I. 2004)
- In re Tuli, 172 F.3d 707, 712 (9th Cir. 1999)
- Precision Etchings & Findings, Inc. v. LGP Gem, Ltd., 953 F.2d 21, 23 (1st Cir. 1992)
- Value Based Consultants, LLC v. Ring MD USA, Inc., No. 24-cv-1596, 2025 WL 2848578, at \*3 (D.P.R. Oct. 8, 2025)
- Pilgrim Badge & Label Corp. v. Barrios, 857 F.2d 1, 3-4 (1st Cir. 1988)
- Connolly v. Doucette, 909 A.2d 221, 223-25 (Me. 2006)
- Bickford v. Onslow Mem. Hosp. Found., Inc., 855 A.2d 1150, 1154-56 (Me. 2004)
- Murphy v. Keenan, 667 A.2d 591, 594-95 (Me. 1995)
- Helicopteros Nacionales de Colombia, S.A. v. Hall, 466 U.S. 408, 417 (1984)
- World-Wide Volkswagen Corp. v. Woodson, 444 U.S. 286, 295 (1980)