

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Brittany Widmayer, et al. v. Otis Worldwide Corporation

Widmayer · No. 2:25-cv-00723-RFB-BNW · Decided January 22, 2026

SUMMARY

The United States District Court for the District of Nevada granted Plaintiffs’ motion for jurisdictional discovery in a dispute concerning whether Otis Elevator’s Nevada contacts may be imputed to Otis Worldwide Corporation under an alter ego theory. The court held that general and specific jurisdiction are alternative bases for personal jurisdiction and that Daimler AG v. Bauman does not preclude alter ego-based general jurisdiction, while limiting discovery at this stage to interrogatories and requests for production.

CASE DETAILS

COURT	United States District Court for the District of Nevada
WRITING FOR THE COURT	Brenda Weksler
JURISDICTION	United States District Court for the District of Nevada
DECIDED	January 22, 2026
DOCKET	2:25-cv-00723-RFB-BNW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved for jurisdictional discovery in response to Defendant's motion to dismiss, which challenged venue and personal jurisdiction. The court granted limited jurisdictional discovery concerning whether Otis Elevator and Otis Worldwide Corporation have sufficient unity of interest to support an alter ego theory of general personal jurisdiction.
STANDARD OF REVIEW	The court evaluated whether Plaintiffs had made a sufficient preliminary showing to obtain jurisdictional discovery and whether their proposed theory of general personal jurisdiction was legally permissible.
PRECEDENTIAL VALUE	unknown
PARTIES	Brittany Widmayer, et al. v. Otis Worldwide Corporation

TOPICS

personal jurisdiction

venue

discovery dispute

motions to dismiss

civil procedure

PRACTICE AREAS

civil procedure

personal jurisdiction

venue

commercial litigation

corporate law

QUESTIONS PRESENTED

1. Whether general and specific personal jurisdiction must both be established to support jurisdiction over Defendant.
2. Whether Daimler AG v. Bauman precludes reliance on an alter ego theory to establish general personal jurisdiction.
3. Whether Plaintiffs were entitled to jurisdictional discovery concerning the potential alter ego relationship between Otis Elevator and Otis Worldwide Corporation.

HOLDINGS

1. General and specific personal jurisdiction are alternative bases for personal jurisdiction; a plaintiff need not establish both.
2. Daimler AG v. Bauman does not preclude an argument that general personal jurisdiction may be established through an alter ego theory.
3. Plaintiffs were entitled to limited jurisdictional discovery concerning the potential unity of interest between Otis Elevator and Otis Worldwide Corporation.

KEY QUOTATIONS

“General and specific jurisdiction are alternative bases for personal jurisdiction, not cumulative requirements.” (at 1)

“Daimler AG does not preclude Defendant from making an argument that this Court has general jurisdiction based on an alter ego theory of liability.” (at 1-2)

“Absent jurisdictional discovery, however, Plaintiffs will have no meaningful opportunity to make the required showing.” (at 2)

FACTUAL BACKGROUND

Plaintiffs sued Otis Worldwide Corporation in the District of Nevada. Defendant challenged venue and personal jurisdiction, arguing that it could not be deemed to reside in Nevada because it was not subject to personal jurisdiction there. Plaintiffs asserted that Otis Elevator, which allegedly had contacts with Nevada, was the alter ego of Otis Worldwide Corporation and sought discovery concerning the entities' unity of interest and ownership.

PROCEDURAL HISTORY

Defendant moved to dismiss on the ground that venue was improper because it was not subject to personal jurisdiction in Nevada. Plaintiffs sought jurisdictional discovery to investigate whether Otis Elevator's Nevada contacts could be attributed to Otis Worldwide Corporation under an alter ego theory. After a hearing, the court granted discovery regarding the potential unity of interest between the entities but declined to authorize depositions at that stage.

DISPOSITION

other

CASES CITED

- Daimler AG v. Bauman, 571 U.S. 117 (2014)
- Schwarzenegger v. Fred Martin Motor Co., 374 F.3d 797, 801-02 (9th Cir. 2004)
- Cybersell, Inc. v. Cybersell, Inc., 130 F.3d 414, 416 (9th Cir. 1997)
- Ranza v. Nike, Inc., 793 F.3d 1059, 1065, 1070-73 (9th Cir. 2015)
- Dole Food Co. v. Patrickson, 538 U.S. 468, 474 (2003)
- United States v. Bestfoods, 524 U.S. 51, 61 (1998)
- Williams v. Yamaha Motor Co., 851 F.3d 1015, 1021 (9th Cir. 2017)