

SUPREME COURT OF MINNESOTA

Bandemer v. Ford Motor Co.

931 N.W.2d 744 (Minn. 2019) · Decided July 31, 2019

SUMMARY

The Minnesota Supreme Court considers whether Minnesota courts may exercise specific personal jurisdiction over Ford Motor Company in a products-liability action involving a Ford vehicle that crashed in Minnesota. The court holds that Ford's sales, advertising, marketing, data-collection, and other contacts with Minnesota sufficiently relate to the claims and that exercising jurisdiction comports with due process. The court affirms the court of appeals.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	McKeig, Justice
JURISDICTION	Minnesota
DECIDED	July 31, 2019
DISPOSITION	affirmed
PROCEDURAL POSTURE	Ford appealed from the Minnesota Court of Appeals' decision affirming the district court's denial of Ford's motion to dismiss for lack of personal jurisdiction.
STANDARD OF REVIEW	Whether personal jurisdiction exists is a question of law reviewed de novo. On a motion to dismiss for lack of personal jurisdiction, the plaintiff must make a prima facie showing, and the court accepts the factual allegations in the complaint and supporting affidavits as true.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Ford Motor Company v. Adam Bandemer

TOPICS

personal jurisdiction products liability due process civil procedure negligence

PRACTICE AREAS

civil procedure constitutional law personal jurisdiction products liability torts

QUESTIONS PRESENTED

1. Whether Minnesota may exercise specific personal jurisdiction over Ford when the particular vehicle involved in the accident was designed, manufactured, and originally sold outside Minnesota.
2. Whether due process requires a causal connection between Ford's Minnesota contacts and Bandemer's claims, or whether jurisdiction is proper when the claims arise out of or relate to those contacts.
3. Whether the exercise of specific personal jurisdiction over Ford comports with fair play and substantial justice.

HOLDINGS

1. Minnesota may exercise specific personal jurisdiction over Ford because Ford purposefully availed itself of Minnesota through substantial sales, advertising, marketing, data collection, and other contacts, and Bandemer's claims arose out of or related to those contacts.
2. Due process does not require that Ford's Minnesota contacts have caused Bandemer's claims; it is sufficient that the claims arise out of or relate to Ford's Minnesota contacts.
3. Exercising specific personal jurisdiction over Ford was consistent with fair play and substantial justice.

KEY QUOTATIONS

“Because there is a substantial connection between the defendant Ford, the forum Minnesota, and the claims brought by Bandemer, Ford's contacts with Minnesota suffice to establish specific personal jurisdiction over the company regarding Bandemer's claims.” (at 755)

“Here, we hold that Ford's contacts alone are sufficient to support specific personal jurisdiction and the reasonableness factors, which heavily favor jurisdiction, do not detract from the reasonableness of asserting jurisdiction over Ford here.” (at 755)

FACTUAL BACKGROUND

Adam Bandemer, a Minnesota resident, was injured while riding as a passenger in a 1994 Ford Crown Victoria involved in a crash on a Minnesota road. Bandemer alleged that the passenger-side airbag failed to deploy because of a defect and asserted products-liability, negligence, and breach-of-warranty claims against Ford. Although the vehicle was designed, manufactured, and originally sold outside Minnesota, Ford sold more than 2,000 1994 Crown Victorias and approximately 200,000 vehicles of all types to Minnesota dealerships during the relevant period, advertised and marketed in Minnesota, collected performance data from Minnesota dealerships, and maintained employees, mechanics, franchises, property, and a service agent in the state.

PROCEDURAL HISTORY

Adam Bandemer filed products-liability, negligence, and breach-of-warranty claims against Ford in Minnesota state district court after suffering injuries in a Minnesota automobile crash. Ford moved to dismiss for lack of personal jurisdiction, but the district court held that jurisdiction was proper. The Minnesota Court of Appeals affirmed, and the Minnesota Supreme Court granted review and affirmed.

DISPOSITION

affirmed

CASES CITED

- Riley v. MoneyMutual, LLC, 884 N.W.2d 321 (Minn. 2016)
- Juelich v. Yamazaki Mazak Optonics Corp., 682 N.W.2d 565 (Minn. 2004)
- Hardrives, Inc. v. City of LaCrosse, 240 N.W.2d 814 (Minn. 1976)
- Valspar Corp. v. Lukken Color Corp., 495 N.W.2d 408 (Minn. 1992)
- International Shoe Co. v. State of Washington, International Shoe Co. v. Washington, 326 U.S. 310 (1945)
- Burger King Corp. v. Rudzewicz, Burger King Corp. v. Rudzewicz, 471 U.S. 462 (1985)
- Hanson, Executrix, et al. v. Denckla et al., Hanson v. Denckla, 357 U.S. 235 (1958)
- World-Wide Volkswagen Corp. v. Woodson, 444 U.S. 286 (1980)
- Walden v. Fiore, Walden v. Fiore, 571 U.S. 277 (2014)
- Bristol-Myers Squibb Co. v. Superior Court of California, 137 S. Ct. 1773 (2017)
- Daimler AG v. Bauman, 571 U.S. 117 (2014)
- Helicopteros Nacionales de Colombia, S.A. v. Hall, 466 U.S. 408 (1984)
- K-V Pharmaceutical Co. v. J. Uriach & CIA, S.A., 648 F.3d 588 (8th Cir. 2011)
- Dent-Air, Inc. v. Beech Mountain Air Serv., Inc., 332 N.W.2d 904 (Minn. 1983)
- Goodyear Dunlop Tires Operations, S.A. v. Brown, 564 U.S. 915 (2011)
- Knowlton v. Allied Van Lines, Inc., 900 F.2d 1196 (8th Cir. 1990)