

SUPREME COURT OF ARIZONA

Jackson v. Chandler, 204 Ariz. 135

61 P.3d 17 (2003) · No. CV-02-0060-PR · Decided January 17, 2003

SUMMARY

The Supreme Court of Arizona held that Arizona's statute of limitations governed a tort action arising from an automobile accident that occurred in Arizona, even though all parties were California residents. Applying Restatement (Second) of Conflict of Laws § 142, the court concluded that Arizona had a substantial interest in regulating and deterring wrongful conduct within the state. The court vacated the court of appeals' decision, reversed the trial court's judgment, and remanded the case.

CASE DETAILS

COURT	Supreme Court of Arizona
WRITING FOR THE COURT	Feldman, Justice (Retired); Charles E. Jones; Ruth V. McGregor; J. Richard Gama; Bethany G. Hicks; Rebecca White Berch; Michael D. Ryan
JURISDICTION	Arizona
DECIDED	January 17, 2003
DOCKET	CV-02-0060-PR
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The Arizona Supreme Court granted review of an Arizona Court of Appeals memorandum decision affirming summary judgment for defendants on statute-of-limitations grounds.
STANDARD OF REVIEW	De novo review of the choice-of-law issue and the summary-judgment ruling is implied; the opinion does not expressly state a standard of review.
PRECEDENTIAL VALUE	Published Arizona Supreme Court en banc opinion; precedential.
PARTIES	Robert Jackson, Jr. v. Donald Frank Chandler, Jane Doe Chandler, Purita Z. Sicat, John Doe Sicat

TOPICS

- statute of limitations
- negligence
- personal injury
- summary judgment
- appellate procedure

PRACTICE AREAS

conflict of laws

torts

statute of limitations

civil procedure

QUESTIONS PRESENTED

1. Whether Arizona or California law governed the statute of limitations for Jackson's tort action arising from an accident, injury, and allegedly wrongful conduct occurring in Arizona.
2. Whether Arizona had a substantial interest in maintaining the claim so that the forum would apply its own statute of limitations under Restatement (Second) of Conflict of Laws § 142 (1988).

HOLDINGS

1. Under Restatement (Second) of Conflict of Laws § 142 (1988), Arizona generally applies its own statute of limitations when the claim is timely under Arizona law, unless maintaining the claim would serve no substantial Arizona interest and the claim would be barred under the law of a state with a more significant relationship to the parties and occurrence.

KEY QUOTATIONS

“as a starting point, the forum's statute of limitations applies.” (§ 8)

“Arizona has a substantial interest in applying its statute of limitations to torts arising from conduct that occurs in the state and produces injury in the state.” (§ 21)

FACTUAL BACKGROUND

In August 1997, Robert Jackson was traveling through Arizona from California to Louisiana when a dust storm sharply reduced visibility. After Jackson pulled into the emergency lane and parked, vehicles driven by California residents Donald Chandler and Purita Sicat collided with each other and struck Jackson's vehicle, causing serious spinal injuries and extensive vehicle damage. Jackson returned to California after hospitalization and filed a tort action in Arizona in August 1999, which was timely under Arizona's two-year limitations period but untimely under California's one-year period.

PROCEDURAL HISTORY

Jackson filed a tort action in La Paz County Superior Court in August 1999. The superior court granted defendants summary judgment, holding that California's one-year statute of limitations barred the action. The court of appeals affirmed, and the Arizona Supreme Court vacated the court of appeals decision, reversed the superior court judgment, and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded to the trial court for further proceedings consistent with the opinion, applying Arizona's statute of limitations.

CASES CITED

- DeLoach v. Alfred, 192 Ariz. 28, 960 P.2d 628 (1998)
- Ledesma v. Jack Stewart Produce, Inc., 816 F.2d 482 (9th Cir. 1987)
- Hurtado v. Superior Court, 11 Cal. 3d 574, 114 Cal. Rptr. 106, 522 P.2d 666 (1974)
- Brandler v. Manuel Trevizo Hay Co., 154 Ariz. 96, 740 P.2d 958 (App. 1987)
- Washington Mut. Bank v. Superior Court, 24 Cal. 4th 906, 103 Cal. Rptr. 2d 320, 15 P.3d 1071 (2001)
- Bryant v. Silverman, 146 Ariz. 41, 703 P.2d 1190 (1985)
- Gust, Rosenfeld & Henderson v. Prudential Ins. Co., 182 Ariz. 586, 898 P.2d 964 (1995)
- Keeton v. Hustler Magazine, Inc., 131 N.H. 6, 549 A.2d 1187 (1988)
- Allen v. Volkswagen of America, Inc., 555 F.2d 361 (3d Cir. 1977)