

APPELLATE COURT OF ILLINOIS, FIFTH DISTRICT

Amanda Toles, on Behalf of Herself and Her Minor Child, Z.T., et al.
v. Mead Johnson & Company, LLC, et al.

2025 IL App (5th) 231205 · No. Nos. 5-23-1205, 5-23-1213 cons. · Decided December 11, 2025

SUMMARY

The Illinois Appellate Court, Fifth District, reviews interlocutory appeals concerning personal jurisdiction, venue, and forum non conveniens in consolidated necrotizing enterocolitis lawsuits involving infant formula products. The court analyzes Mead Johnson’s general and specific contacts with Illinois, including its former headquarters, ongoing Illinois operations, product marketing, and distribution activities. The opinion also addresses the defendants’ motions to transfer venue and dismiss or transfer under forum non conveniens.

CASE DETAILS

COURT	Appellate Court of Illinois, Fifth District
WRITING FOR THE COURT	Justice McHaney; Justice Moore; Justice Hackett
JURISDICTION	Illinois Appellate Court, Fifth District
DECIDED	December 11, 2025
DOCKET	Nos. 5-23-1205, 5-23-1213 cons.
DISPOSITION	affirmed
PROCEDURAL POSTURE	Interlocutory appeal under Illinois Supreme Court Rule 306 from orders denying motions challenging personal jurisdiction, venue, and forum non conveniens.
STANDARD OF REVIEW	Personal-jurisdiction factual findings are reviewed for manifest error when an evidentiary hearing has occurred, while legal conclusions and the ultimate jurisdictional determination are reviewed de novo. Venue factual findings are reviewed for manifest error and legal conclusions de novo. Forum non conveniens rulings are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published precedential opinion of the Illinois Appellate Court, Fifth District.
PARTIES	Mead Johnson & Company, LLC, Mead Johnson Nutrition Company, Abbott Laboratories, Abbott Laboratories, Inc. v. Amanda Toles, on

TOPICS

personal jurisdiction forum non conveniens venue interlocutory appeal civil procedure

PRACTICE AREAS

civil procedure personal jurisdiction venue forum non conveniens products liability

QUESTIONS PRESENTED

1. Whether Illinois courts had general and specific personal jurisdiction over Mead Johnson with respect to the nonresident plaintiffs' claims.
2. Whether the defendants established that venue in St. Clair County was improper under Illinois's statutory venue provisions.
3. Whether the defendants established that the private and public interest factors strongly favored transfer or dismissal under the doctrine of forum non conveniens.

HOLDINGS

1. Illinois courts had general personal jurisdiction over Mead Johnson because its principal place of business was in Illinois during a substantial portion of the relevant period and, even after its claimed relocation, its continuing Illinois operations were substantial and continuous enough to render it essentially at home in Illinois.
2. Illinois courts had specific personal jurisdiction over Mead Johnson because Mead Johnson purposefully directed its activities at Illinois through continuous marketing, sales, hospital contracts, and WIC-program participation, and the plaintiffs' products-liability claims arose out of or related to those contacts; exercising jurisdiction was also reasonable.
3. The defendants failed to establish that venue in St. Clair County was improper. Mead Johnson did not provide specific facts proving the quantity or volume of its business in the county, and venue established for Mead Johnson also applied to Abbott in cases where Mead Johnson was joined as a defendant.
4. The circuit court did not abuse its discretion by denying the defendants' motions to transfer or dismiss under forum non conveniens because the defendants failed to show that the relevant private and public interest factors strongly favored the proposed alternative forums.

KEY QUOTATIONS

“Further, we find that even after Mead Johnson claims to have moved its principal place of business out of Illinois, it continued to have substantial and continuous contacts with Illinois as to render it essentially at home in Illinois” (¶ 23)

“That does not mean anything goes. In the sphere of specific jurisdiction, the phrase ‘relate to’ incorporates real limits, as it must to adequately protect defendants foreign to a forum.” (¶ 39)

“the circuit court carefully balanced the requisite private and public factors” (¶ 100)

FACTUAL BACKGROUND

The plaintiffs alleged that premature infants consumed the defendants' cow's-milk-based infant formula or fortifier and developed necrotizing enterocolitis, resulting in serious injury or death. Mead Johnson maintained an Illinois headquarters and substantial Illinois operations during part of the relevant period, continuously marketed specialized preterm-infant products in Illinois, and maintained Illinois hospital, distribution, and WIC-related contacts. Abbott and Mead Johnson sought dismissal or transfer based on personal jurisdiction, improper venue, and forum non conveniens, arguing that the cases belonged in the counties or states where the infants were born, treated, or allegedly consumed the products.

PROCEDURAL HISTORY

Plaintiffs filed products-liability and related tort claims in the St. Clair County circuit court alleging that the defendants' cow's-milk-based preterm infant formula or fortifier caused necrotizing enterocolitis. The circuit court coordinated numerous related NEC cases and denied Mead Johnson's motion to dismiss for lack of personal jurisdiction, as well as the defendants' motions to transfer venue or dismiss or transfer under forum non conveniens. The Illinois Appellate Court granted the defendants' petitions for leave to appeal and affirmed.

DISPOSITION

affirmed

CASES CITED

- Aspen American Insurance Co. v. Interstate Warehousing, Inc., 2017 IL 121281
- Rios v. Bayer Corp., 2020 IL 125020
- Russell v. SNFA, 2013 IL 113909
- Daimler AG v. Bauman, 571 U.S. 117 (2014)
- Ford Motor Co. v. Montana Eighth Judicial District Court, 592 U.S. 351 (2021)
- World-Wide Volkswagen Corp. v. Woodson, 444 U.S. 286 (1980)
- Burger King Corp. v. Rudzewicz, Burger King Corp. v. Rudzewicz, 471 U.S. 462 (1985)
- Linder v. A.W. Chesterton Co., 2020 IL App (5th) 200101
- Harden v. Mead Johnson & Co., LLC, No. 24 CV 108, 2024 WL 2882214 (N.D. Ill. June 7, 2024)
- Tabirta v. Cummings, 2020 IL 124798
- Weaver v. Midwest Towing, Inc., 116 Ill. 2d 279 (1987)
- Stambaugh v. International Harvester Co., 102 Ill. 2d 250 (1984)
- Langenhorst v. Norfolk Southern Ry. Co., 219 Ill. 2d 430 (2006)
- Gridley v. State Farm Mutual Automobile Insurance Co., 217 Ill. 2d 158 (2005)
- Fennell v. Illinois Central R.R. Co., 2012 IL 113812
- Benedict v. Abbott Laboratories, Inc., 2018 IL App (1st) 180377

- Piper Aircraft Co. v. Reyno, 454 U.S. 235 (1981)
- Smith v. Walgreen Co., 2024 IL App (5th) 240394
- Adamian v. Balash, 2024 IL App (1st) 231876

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