

SUPREME COURT OF THE UNITED STATES

World-Wide Volkswagen Corp. v. Woodson

444 U.S. 286 (1980) · No. No. 78-1078 · Decided January 21, 1980

SUMMARY

The Supreme Court held that Oklahoma could not exercise personal jurisdiction over a New York automobile retailer and regional distributor whose only connection to Oklahoma was that a vehicle sold in New York was involved in an accident there. The Court concluded that the defendants lacked the minimum contacts, purposeful availment, and affiliating circumstances required by the Due Process Clause of the Fourteenth Amendment. Justice Brennan dissented, emphasizing fairness, the forum state's interests, and the burden of litigation.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice White
JURISDICTION	Federal
DECIDED	January 21, 1980
DOCKET	No. 78-1078
DISPOSITION	reversed
PROCEDURAL POSTURE	Petitioners sought review by writ of prohibition and then certiorari after the Oklahoma Supreme Court denied relief and held that Oklahoma could exercise personal jurisdiction over them in a products-liability action.
STANDARD OF REVIEW	De novo review of whether the exercise of personal jurisdiction comports with the Due Process Clause of the Fourteenth Amendment.
PRECEDENTIAL VALUE	binding
PARTIES	World-Wide Volkswagen Corp., Seaway Volkswagen, Inc. v. Charles S. Woodson, District Judge of Creek County, Oklahoma, Harry Robinson, Kay Robinson, Robinson children

TOPICS

- personal jurisdiction
- due process
- civil procedure
- federalism
- torts

PRACTICE AREAS

Civil procedure

Constitutional law

Products liability

Torts

QUESTIONS PRESENTED

1. Whether Oklahoma could exercise personal jurisdiction over a nonresident automobile retailer and regional distributor whose only connection with Oklahoma was that an automobile sold in New York to New York residents later entered Oklahoma and was involved in an accident there.
2. Whether foreseeability that an automobile might travel to Oklahoma, or alleged revenue from goods used in Oklahoma, satisfies the minimum-contacts requirement of the Due Process Clause.

HOLDINGS

1. Oklahoma could not constitutionally exercise personal jurisdiction over the nonresident retailer and regional distributor because they had no minimum contacts, ties, or relations with Oklahoma.
2. Mere foreseeability that a product may find its way into the forum State is insufficient; the relevant foreseeability is whether the defendant's conduct and connection with the forum are such that the defendant should reasonably anticipate being haled into court there.
3. Financial benefits accruing from a collateral relationship to the forum do not support personal jurisdiction when they do not stem from a constitutionally cognizable contact with the forum.

KEY QUOTATIONS

"a state court may exercise personal jurisdiction over a nonresident defendant only so long as there exist 'minimum contacts' between the defendant and the forum State." (444 U.S. at 291)

"the Due Process Clause 'does not contemplate that a state may make binding a judgment in personam against an individual or corporate defendant with which the state has no contacts, ties, or relations.'" (444 U.S. at 294)

"the foreseeability that is critical to due process analysis is not the mere likelihood that a product will find its way into the forum State." (444 U.S. at 297)

"it is that the defendant's conduct and connection with the forum State are such that he should reasonably anticipate being haled into court there." (444 U.S. at 297-298)

"financial benefits accruing to the defendant from a collateral relation to the forum State will not support jurisdiction if they do not stem from a constitutionally cognizable contact with that State." (444 U.S. at 299)

FACTUAL BACKGROUND

Harry and Kay Robinson, New York residents relocating to Arizona, purchased an Audi from Seaway Volkswagen in New York. While traveling through Oklahoma, their Audi was struck from behind and caught fire, seriously injuring Kay Robinson and two children. The regional distributor, World-Wide Volkswagen, operated only in New York, New Jersey, and Connecticut, while Seaway operated in New York; neither

conducted business, solicited sales, advertised, shipped products, or maintained an agent in Oklahoma, and the record showed only that the one Audi involved in the accident had entered Oklahoma.

PROCEDURAL HISTORY

The Robinsons filed a products-liability action in the District Court for Creek County, Oklahoma, against Audi, Volkswagen, World-Wide, and Seaway. World-Wide and Seaway entered special appearances challenging personal jurisdiction. The Oklahoma trial court rejected their constitutional claim, and the Supreme Court of Oklahoma denied a writ of prohibition, concluding that the Oklahoma long-arm statute authorized jurisdiction. The United States Supreme Court granted certiorari and reversed.

DISPOSITION

reversed

CASES CITED

- International Shoe Co. v. State of Washington, International Shoe Co. v. Washington, 326 U.S. 310 (1945)
- Hanson, Executrix, et al. v. Denckla et al., Hanson v. Denckla, 357 U.S. 235 (1958)
- Kulko v. California Superior Court, 436 U.S. 84 (1978)
- Pennoyer v. Neff, 95 U.S. 714 (1878)
- Mullane v. Central Hanover Trust Co., 339 U.S. 306 (1950)
- Milliken v. Meyer, 311 U.S. 457 (1940)
- McGee v. International Life Insurance Co., 355 U.S. 220 (1957)
- Shaffer v. Heitner, 433 U.S. 186 (1977)
- H. P. Hood & Sons, Inc. v. Du Mond, 336 U.S. 525 (1949)
- Gray v. American Radiator & Standard Sanitary Corp., 22 Ill. 2d 432, 176 N.E.2d 761 (1961)
- Erlanger Mills, Inc. v. Cohoes Fibre Mills, Inc., 239 F.2d 502 (4th Cir. 1956)
- Reilly v. Phil Tolkman Pontiac, Inc., 372 F. Supp. 1205 (N.J. 1974)
- Uppgren v. Executive Aviation Services, Inc., 304 F. Supp. 165 (Minn. 1969)
- Harris v. Balk, 198 U.S. 215 (1905)
- Fields v. Volkswagen of America, Inc., 555 P.2d 48 (Okla. 1976)
- Carmack v. Chemical Bank New York Trust Co., 536 P.2d 897 (Okla. 1975)
- Hines v. Clendenning, 465 P.2d 460 (Okla. 1970)
- Tilley v. Keller Truck & Implement Corp., 200 Kan. 641, 438 P.2d 128 (1968)
- Granite States Volkswagen, Inc. v. District Court, 177 Colo. 42, 492 P.2d 624 (1972)
- Pellegrini v. Sachs & Sons, 522 P.2d 704 (Utah 1974)
- Oliver v. American Motors Corp., 70 Wash. 2d 875, 425 P.2d 647 (1967)
- Tyson v. Whitaker & Son, Inc., 407 A.2d 1 (Me. 1979)
- Hess v. Pawloski, 274 U.S. 352 (1927)

