

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

Magdi Rashid v. Qatar Airways Group Q.C.S.C.

Rashid · No. 1:25-cv-10109 · Decided December 19, 2025

SUMMARY

The United States District Court for the District of Massachusetts denied Qatar Airways’ motion to dismiss for lack of personal jurisdiction. The court held that the Foreign Sovereign Immunities Act provided a basis for jurisdiction and, alternatively, that Qatar Airways had sufficient contacts with the United States for specific jurisdiction under the Fifth Amendment. The claims arise from injuries allegedly sustained while the plaintiff was boarding a Qatar Airways flight from Cairo to Doha as part of an itinerary to Virginia and are governed by the Montreal Convention.

CASE DETAILS

COURT	United States District Court for the District of Massachusetts
WRITING FOR THE COURT	Allison D. Burroughs
JURISDICTION	United States District Court for the District of Massachusetts
DECIDED	December 19, 2025
DOCKET	1:25-cv-10109
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiffs brought claims against Qatar Airways under the Montreal Convention, and Qatar Airways moved to dismiss under Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction. The court denied the motion.
STANDARD OF REVIEW	On a Rule 12(b)(2) motion without an evidentiary hearing, the court applied the prima facie standard: plaintiffs had to proffer evidence which, if credited, would support all facts essential to personal jurisdiction. The court credited plaintiffs' version of genuinely contested facts and considered uncontradicted facts offered by defendant.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive but not binding outside the case

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QUESTIONS PRESENTED

1. Whether the Foreign Sovereign Immunities Act authorized personal jurisdiction over Qatar Airways as an agency or instrumentality of Qatar where the commercial-activity exception applied and service was proper.
2. Whether the Fifth Amendment Due Process Clause required a minimum-contacts analysis before exercising personal jurisdiction over Qatar Airways.
3. Whether plaintiffs made a prima facie showing of specific personal jurisdiction based on Qatar Airways' U.S. contacts, the relationship between those contacts and the claims arising from the Cairo-to-Doha flight, and the reasonableness of exercising jurisdiction.

HOLDINGS

1. The court had personal jurisdiction over Qatar Airways because the commercial-activity exception to FSIA immunity applied and Qatar Airways was properly served under the FSIA.
2. The court proceeded on the assumption that the Fifth Amendment Due Process Clause required a constitutional personal-jurisdiction analysis, and plaintiffs made a prima facie showing of sufficient contacts with the United States.
3. Qatar Airways was not subject to general personal jurisdiction in the United States because its U.S. operations did not render it essentially at home there.
4. Plaintiffs made a prima facie showing of specific personal jurisdiction over Qatar Airways under the Fifth Amendment.

KEY QUOTATIONS

“Personal jurisdiction exists under § 1330(b) of the FSIA when an immunity exception applies and service is proper.” (at 5)

“Specific jurisdiction exists when there is a demonstrable nexus between a plaintiff’s claims and a defendant’s forum-based activities.” (at 9)

“The fact that Mr. Rashid’s itinerary included a layover in Doha does not necessarily negate the connection between Qatar Airways’ contacts with the United States and Plaintiffs’ injuries.” (at 11)

FACTUAL BACKGROUND

Magdi and Dahlia Rashid, Virginia residents, traveled on Qatar Airways from Cairo to Doha, with a ticketed itinerary continuing to Virginia. During boarding in Cairo, Magdi Rashid twice asked cabin crew to assist with stowing his carry-on baggage; after receiving no assistance, he attempted to stow it himself and allegedly

suffered head, neck, and bodily injuries. He was delayed in Doha for approximately 30 days, and his baggage was later returned in damaged condition. Qatar Airways is a Qatari state-owned airline that operates flights to the United States, maintains U.S. offices, employs U.S.-based personnel, and markets and sells tickets to U.S. consumers.

PROCEDURAL HISTORY

Plaintiffs filed the action on January 15, 2025. Qatar Airways moved to dismiss the Complaint for lack of personal jurisdiction on June 6, 2025. Plaintiffs opposed the motion, and the district court denied it.

DISPOSITION

denied

CASES CITED

- Callahan v. Wells Fargo & Co., 747 F. Supp. 2d 247, 251 (D. Mass. 2010)
- Mass. Sch. of Law at Andover, Inc. v. Am. Bar Ass'n, 142 F.3d 26, 34 (1st Cir. 1998)
- Baskin-Robbins Franchising LLC v. Alpenrose Dairy, Inc., 825 F.3d 28, 34 (1st Cir. 2016)
- Daynard v. Ness, Motley, Loadholt, Richardson & Poole, P.A., 290 F.3d 42, 50-51, 60 (1st Cir. 2002)
- Foster-Miller, Inc. v. Babcock & Wilcox Canada, 46 F.3d 138, 144-145 (1st Cir. 1995)
- Bluetarp Fin., Inc. v. Matrix Constr. Co., 709 F.3d 72, 79 (1st Cir. 2013)
- Platten v. H.G. Berm. Exempted Ltd., 437 F.3d 118, 134 (1st Cir. 2006)
- Boit v. Gar-Tec Prods., Inc., 967 F.2d 671, 675 (1st Cir. 1992)
- Fuld v. Palestine Liberation Org., 606 U.S. 1, 11, 18 (2025)
- Daimler AG v. Bauman, 571 U.S. 117, 122, 137 n.19 (2014)
- Merlini v. Canada, 926 F.3d 21, 27 (1st Cir. 2019)
- Universal Trading & Inv. Co. v. Bureau for Representing Ukrainian Interests in Int'l & Foreign Courts, 727 F.3d 10, 16 (1st Cir. 2013)
- United Elec., Radio & Mach. Workers v. 163 Pleasant St. Corp., 960 F.2d 1080, 1085 (1st Cir. 1992)
- Swiss Am. Bank, Ltd. v. United States, 274 F.3d 610, 618-619 (1st Cir. 2001)
- Helicopteros Nacionales de Colombia, S.A. v. Hall, 466 U.S. 408, 416 (1984)
- Groma, LLC v. BuildRE, LLC, 668 F. Supp. 3d 40, 47 (D. Mass. 2023)
- Motus, LLC v. CarData Consultants, Inc., 23 F.4th 115, 124 (1st Cir. 2022)
- A Corp. v. All Am. Plumbing, Inc., 812 F.3d 54, 60 (1st Cir. 2016)
- Cappello v. Rest. Depot, LLC, 89 F.4th 238, 245 (1st Cir. 2023)
- Rodriguez-Rivera v. Allscripts Healthcare Sols., Inc., 43 F.4th 150, 160 (1st Cir. 2022)
- Ford Motor Co. v. Montana Eighth Jud. Dist. Ct., 592 U.S. 351, 362 (2021)
- Walden v. Fiore, Walden v. Fiore, 571 U.S. 277, 290 (2014)
- Plexier Int'l, Inc. v. Scrutinizer GmbH, 905 F.3d 1, 12 (1st Cir. 2018)

- Ojugbana v. Virgin Atl. Airways Ltd., 2024 WL 4681751, at *3-*5 (D. Mass. Nov. 5, 2024)
- Zito v. United Airlines, Inc., 523 F. Supp. 3d 377, 386 (W.D.N.Y. 2021)
- H.B. by Barakati v. China S. Airlines Co. Ltd., 2021 WL 2581151, at *1 (S.D.N.Y. June 23, 2021)
- Tavantzis v. Am. Airlines, Inc., 2024 WL 5446322, at *6 (N.D. Cal. July 19, 2024)
- Khan v. Qatar Airways Corp., 2024 WL 3744397, at *4 (S.D. Tex. Aug. 8, 2024)
- Roesch v. Korean Air Lines Co., 2025 WL 2200920, at *2 (N.D. Tex. Aug. 1, 2025)
- Broadus v. Delta Air Lines, Inc., 101 F. Supp. 3d 554, 557 (M.D.N.C. 2015)
- Dagı v. Delta Airlines, Inc., 961 F.3d 22, 27 (1st Cir. 2020)
- Moore v. British Airways PLC, 32 F.4th 110, 115 (1st Cir. 2022)
- Deugoue v. Icelandair, 2024 WL 4069020, at *6 (D. Mass. Sept. 5, 2024)
- ACE Am. Ins. Co. v. Univ. of Ghana, 2022 WL 3362193, at *5 (S.D.N.Y. Aug. 15, 2022)
- Berg v. Kingdom of the Netherlands, 2020 WL 2829757, at *14 (D.S.C. Mar. 6, 2020)
- Parex Bank v. Russian Sav. Bank, 116 F. Supp. 2d 415, 422 (S.D.N.Y. 2000)
- Mobil Cerro Negro, Ltd. v. Bolivarian Republic of Venezuela, 863 F.3d 96, 104 (2d Cir. 2017)

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