



## Personal Jurisdiction: Key Appellate Decisions Issued in CA and IL

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The U.S. Supreme Court's decision in *Daimler AG v. Bauman*, 134 S.Ct. 746 (2014) established limits on state courts' ability to assert general jurisdiction over foreign companies, which the legal community thought may result in less forum shopping.

Since *Daimler*, however, plaintiffs' counsel have focused increasingly on establishing specific jurisdiction over non-resident defendants. As a result of their efforts, appellate decisions in California and Illinois have made it easier for plaintiffs to establish specific jurisdiction over non-resident defendants in those two states. Both courts found personal jurisdiction to be present over non-resident defendants based on marketing and development-related activities within the state, holding that the claims "arose out of" those activities either because the activities were part of a "nationwide" plan or "in part" informed defendants regarding the conduct at issue. In both cases, the courts emphasized that fairness favored a single location for the cases over a "scattershot" or "piecemeal" approach.

Read the Client Alert [here](#).

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