

IN THE SUPREME COURT OF THE STATE OF MONTANA
SUPREME COURT CAUSE NO. OP 19-0099

FORD MOTOR COMPANY,

Petitioner,

v.

MONTANA EIGHTH JUDICIAL DISTRICT COURT,
ELIZABETH BEST;

Respondent.

**LUCERO'S RESPONSE TO PETITION FOR
WRIT OF SUPERVISORY CONTROL**

*Original Proceeding Arising from Lucero v. Ford Motor Company,
Cause No. ADV-18-247(b), Montana Eighth Judicial District, Cascade County,
Honorable Elizabeth A. Best, District Court Judge*

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INTRODUCTION

Ford Motor Company (“Ford”) has petitioned for a writ of supervisory control claiming the District Court lacks personal jurisdiction over Ford. Ford’s jurisdictional arguments lack merit and distort applicable law on specific jurisdiction.

SUMMARY OF ARGUMENT

The District Court correctly determined it has specific jurisdiction over Ford following its findings that Ford’s actions come within Montana’s long-arm jurisdiction statute; and its exercise of jurisdiction comports with due process. See *Bunch v. Lancair Int’l, Inc.*, 2009 MT 29, ¶ 17, 349 Mont. 144, 202 P.3d 784.

Ford’s criticism of the District Court’s decision amounts to:

- The exercise of specific personal jurisdiction is based on Ford’s connections to Montana that have nothing to do with Plaintiff’s claims.
- Plaintiff’s claim must *arise out* of a defendant’s in-state activities.
- Plaintiff’s claims do not arise from any business Ford conducted in Montana.

Ford’s arguments are wrong because Plaintiff’s claims relate to Ford’s forum-related contacts, and Ford completely ignores the stream of commerce doctrine in the context of product liability.

For decades, Ford has sold Explorer SUVs in Montana. Ford’s in-state activities have included: intentionally targeting Montana customers; marketing, advertising, and servicing Explorers. Ford argues that, because the first sale of this

particular Explorer did not occur in Montana, Plaintiff's cause of action does not *arise out of* Ford's Montana contacts. Ford is wrong and offers no controlling precedent adopting such a restrictive interpretation. The relevant contact is the purposeful placing of the vehicle into the stream of commerce with full knowledge and expectation that consumers will cross borders and use the product in interstate commerce, and that a consumer in Montana could and would purchase and use the vehicle. But for Ford's act of placing Explorers destined for Montana in the stream of commerce, the accident would not have happened. The District Court's finding of jurisdiction over Ford comports with decades of Montana and U.S. Supreme Court decisions.

STATEMENT OF FACTS

This Court must take all well-pleaded jurisdictional allegations in Plaintiff's Complaint as admitted and construe the Complaint in the light most favorable to the Plaintiff. *Turner v. Tranakos*, 229 Mont. 51, 54–55, 744 P.2d 898, 900 (1987). To support its motion to dismiss for lack of jurisdiction, Ford submitted affidavits challenging jurisdiction which, when combined with the jurisdictional allegations of Plaintiff's Complaint at ¶¶ 12-14, show that the Decedent ("Markkaya") and her heirs and survivors were Montana citizens and residents at the time of death. Ford is a Delaware corporation with its principal place of business in Dearborn, Michigan, and is registered to do business in Montana, with its registered agent in Missoula.

Ford has a national dealership network that sells, services, and repairs Ford vehicles and honors Ford's warranties for new and used vehicles in Montana. Ford owns or licenses 36 Ford dealerships in Montana which provide sales and service to residents of Montana on Ford products. Ford operates subsidiary companies in Montana, including Ford Motor Credit, which employ Montana residents.

Ford advertises Explorers in Montana as safe and stable passenger-carrying vehicles. Ford designed, manufactured, advertised, and distributed into the stream of commerce its 1996 model Ford Explorers in all 50 states. It knew the Explorers would be purchased new and used in Montana and/or transported into Montana from surrounding states. Ford purposefully derived benefit from its Montana and interstate activities in selling, servicing, and repairing Explorers.

The subject Explorer was assembled in Ford's Louisville, Kentucky, plant; shipped to a Ford dealership in Washington; and sold new to an Oregon resident. The Explorer came to Montana in the stream of commerce as Ford expected. On March 24, 2009, the Explorer was purchased by Markkaya's mother, Tracy McGann of Thompson Falls, Montana. The purchase occurred in Montana. Mrs. McGann registered the Explorer with the Montana Motor Vehicle Department and licensed the vehicle in Montana.

On October 5, 2009, Ford issued a "Safety Recall" of the Explorer, which included Ford contacting all registered owners, like Mrs. McGann, to alert the owner

of the recall and offer free repair through its local Montana dealership network. The crash occurred in Montana when the Explorer was owned by Mrs. McGann. Montana is the home state of all accident witnesses. Defendants Goodyear and Tires Plus share no home state with Ford.

STANDARD OF REVIEW

Whether Montana has personal jurisdiction over a nonresident is a question of law, which this Court reviews de novo. It reviews a district court's findings of fact and conclusions of law regarding personal jurisdiction to determine whether the findings are clearly erroneous and whether the conclusions are correct. *Nolan v. RiverStone HealthCare*, 2017 MT 63, ¶ 9, 387 Mont. 97, 391 P.3d 95.

ARGUMENT

I. THE DISTRICT COURT PROPERLY CONCLUDED THAT MONTANA HAS SPECIFIC JURISDICTION OVER FORD UNDER ITS LONG-ARM JURISDICTION STATUTE AND DUE PROCESS STANDARDS.

A. Long-Arm Statute

Montana's long arm statute, Rule 4(b)(1), Mont.R.Civ.P., gives power to the court to exert specific jurisdiction and provides that, "any person is subject to [Montana personal jurisdiction] as to any claim for relief arising from the doing of any of the following acts: (A) the transaction of any business within Montana; (B) the commission of any act resulting in accrual within Montana of a tort action; [and]

(C) the ownership, use, or possession of any property, or of any interest therein, situated within Montana.”

Ford is licensed to and transacts business within Montana. The fatal crash occurred in Montana, a Montana resident was killed using Ford’s product in Montana, and the tort accrual provision under Rule 4(b)(1)(B) is met. *Bunch*, ¶ 40. On the ownership of Montana property, before the District Court, Ford claimed it owned no factories in Montana. But, it is undisputed that Ford maintains offices in Montana, has employees in Montana, and derives significant profit from sales and services in Montana. Affidavit of Ford employee Eric Kalis at ¶ 7.

Taking all allegations as true, Ford could not persuade the District Court it lacked specific personal jurisdiction over Ford:

Applying the plain language of Rule 4(b)(1), Mont.R.Civ.P., Ford transacts business within Montana, allegedly committed acts or omissions resulting in accrual within Montana of a tort action, and it owns, uses, or possesses property or interests in property within Montana. Under these facts, Rule 4(b)(1), Mont.R.Civ.P., applies, and Montana has specific personal jurisdiction of Ford.

Order, p. 8. Because jurisdiction over Ford is unquestionably conferred under the long-arm statute, the District Court went on to examine the three-prong due process inquiry.

B. Due Process

The three-prong due process inquiry provides:

- (1) The non-resident defendant must purposefully direct his activities or consummate some transaction with the forum or resident thereof; or perform some act by which he purposefully avails himself of the privilege of conducting activities in the forum, thereby invoking the benefits and protections of its laws;
- (2) the claim must be one which arises out of or relates to the defendant's forum-related activities; and
- (3) the exercise of jurisdiction must comport with fair play and substantial justice, i.e. it must be reasonable.

Schwarzenegger v. Fred Martin Motor Co., 374 F.3d 797, 802 (9th Cir. 2004).

Bristol-Myers Squibb Co. v. Superior Court of California, San Francisco Cty., 137 S. Ct. 1773, 1780 (2017) clarified the mandatory nature of the second prong—"the suit must arise out of or relate to the defendant's contacts with the forum."

Ford argues Montana can never exercise specific jurisdiction in a product liability case unless the defective product was designed, manufactured, or first sold in Montana. This argument is wrong and ignores over four decades of U.S. Supreme Court and Montana precedent.

In *Great Plains Crop Management, Inc. v. Tryco Mfg. Co. Inc.*, 554 F. Supp. 1025 (D. Mont. 1983), specific jurisdiction was found when an out-of-state corporation conducted "substantial" activities in Montana, including marketing, accepting Montana sales calls, soliciting business, and selling products to Montana residents. *Great Plains*, 554 F.Supp. at 1027.

In *Grizzly Sec. Armored Exp., Inc. v. Armored Group, LLC*, 2011 MT 128, 360 Mont. 517, 255 P.3d 143, the defendant (“TAG”) manufactured and sold armored vehicles throughout the United States. Grizzly, a Montana company, purchased two armored vehicles from TAG. Grizzly claimed the vehicles had mechanical problems and body damage, which TAG was responsible to repair. Although TAG did not solicit business or sell products in Montana, specific jurisdiction was found because TAG’s advertising reached Montana, its website conducted business throughout the United States, and the defendants serviced new and used products in Montana.

Ford erroneously analyzes whether Plaintiff’s claims each arose out of the long-arm acts, relying on *Tackett v. Duncan*, 2014 MT 253, 376 Mont. 348, 334 P.3d 920, and *Milky Whey, Inc. v. Dairy Partners, LLC*, 2015 MT 18, 378 Mont. 75, 342 P.3d 13.

Tackett implicated only the accrual element of Rule 4(b)(1)(B), M.R.Civ.P. *Tackett*, ¶ 24. More importantly, the nonresident defendants did not transact any business in Montana; they never resided or owned property in Montana; and they never traveled to, conducted activities within, or sent anything or anyone to Montana. *Tackett*, ¶¶ 5-6, 34. The same was true in *Milky Whey*. The nonresident defendant never sold any product or engaged in the performance of any service in Montana, had offices in Montana, or solicited business in Montana. *Milky Whey*,

¶ 29. In short, the defendants in *Tackett* and *Milky Whey* had absolutely no contacts with Montana.

Bunch reached the same result on similar factual findings. Unlike Ford, the defendants in *Bunch* did not deliver products or advertise in Montana; had no real estate or property interests, or dealers within this state; and were not registered to do business in Montana. Further, the aircraft was sold to an Oregon resident in California. *Bunch*, ¶¶ 5-6, 10-11.

Tackett, *Milky Whey*, and *Bunch* did not implicate defendants availing themselves of Montana law or activities. Yet, they reject Ford’s argument that personal jurisdiction accrues only when a plaintiff’s claims arise out of the long-arm connections. That is, to confer personal jurisdiction, “Montana’s long-arm statute does not require that a product actually be sold in or delivered in Montana.” *Milky Whey*, ¶ 29. Instead, personal jurisdiction may rest on unrelated business activities. *Milky Whey, Inc.*, ¶¶ 31, and 34.

Besides Montana cases, the District Court cited a host of cases where courts on similar facts found sufficient forum contact to trigger specific jurisdiction. Order, pp. 11-12. One cited was *World-Wide Volkswagen v. Woodson*, 444 U.S. 286, 100 S.Ct. 559, 62 L.Ed.2d 490 (1980), which partly affirmed Oklahoma’s jurisdiction where the vehicle was not designed, made, or sold in Oklahoma:

When a corporation "purposefully avails itself of the privilege of conducting activities within the forum State, *Hanson v. Denekla*, 357 U.S., at 253, 78 S. Ct., at 1240, it has clear notice that it is subject to suit there, and can act to alleviate the risk of burdensome litigation by procuring insurance, passing the expected costs on to customers, or, if the risks are too great, severing its connection with the State. Hence if the sale of a product of a manufacturer or distributor such as Audi or Volkswagen is not simply an isolated occurrence, but arises from the efforts of the manufacturer or distributor to serve directly or indirectly, the market for its product in other States, it is not unreasonable to subject it to suit in one of those States if its allegedly defective merchandise has there been the source of injury to its owner or to others.

Id., 444 U.S. at 297-98, 100 S. Ct. at 567.

In *Goodyear Dunlop Tires Operations, S.A. v. Brown*, 131 S. Ct. 2846, 2849 (2011), the U.S. Supreme again emphasized that the "flow of a manufacturer's products into the forum" is an "affiliation" that supports exercising specific jurisdiction over a "nonresident defendant acting *outside* the forum":

The stream-of-commerce cases . . . relate to exercises of specific jurisdiction in products liability actions, in which a nonresident defendant, acting outside the forum, places in the stream of commerce a product that ultimately causes harm inside the forum. Many state long-arm statutes authorize courts to exercise specific jurisdiction over manufacturers when the events in suit, or some of them, occurred within the forum State.... Flow of a manufacturer's products into the forum may bolster an affiliation germane to specific jurisdiction, see, e.g., *World-Wide Volkswagen Corp.* ...

World-Wide Volkswagen and its progeny remains the test for specific jurisdiction. E.g., *In re Chinese Manufactured Drywall Prods. Liab. Litig.*, 894 F.Supp. 2d 819 (D.C. E.D. La. 2012); *Book v. Voma Tire Corp.*, 860 N. W. 2d 576

(Iowa 2015); *Willemsen v. Invacare Corp.*, 282 P.3d 867 (Ore. 2012). As Justice Stevens' noted in his concurrence in *Asahi Metal Industry Co., Ltd. v. Superior Court of California*, 480 U.S. 102, 122, 107 S.Ct. 1026, 1037, 94 L. Ed. 2d 92 (1987), the jurisdictional analysis "is affected by the volume, the value, and the hazardous character of the components."

The District Court summarized its finding that the exercise of personal jurisdiction over Ford comports with due process, concluding:

- 1) Ford committed multiple acts demonstrating that it availed itself of conducting activities in Montana and invoked Montana law. Ford sells cars and trucks in all 50 states through dealerships by delivering them into the stream of commerce. Ford are purchased in Montana and used by Montanans. Ford engaged in substantial business in Montana. Ford is registered to do business in Montana, has 36 dealerships in Montana, and operates subsidiary companies in Montana. On October 5, 2009, after the vehicle in this case was licensed and registered in Montana, Ford issued a "Safety Recall" for that vehicle. Ford provided recall services in Montana, including certified repair and replacement.
- 2) The claim must arise out of the defendant's forum-related activities. This element is mandatory. *Bristol-Myers Squibb Co. v. Sup. Ct. Cal.*, 137 S.Ct. 1773, 198 L.Ed. 2d 395 (2017). The crash, and Gullett's death, occurred in Montana, in a wrecked Ford vehicle. The tort accrued in Montana, because damages were sustained here. Ford does business selling and repairing its vehicles in Montana. It sells the kind of vehicle involved in this case in Montana. It advertises in Montana. It sells Ford parts in Montana. Its subsidiary; Ford Motor Credit, has contracts with dealerships in Montana to provide lines of credit, and with Montana consumers to provide credit to enable purchases of Ford vehicles. As in *Grizzly Security*, and unlike *Tyrrell*, here, Ford solicits business, sells products in Montana, advertises in

Montana, and services its vehicles in Montana. The Plaintiff alleges that Ford's design of the vehicle involved the Montana wreck was defective, and caused the crash. Ford's contacts with Montana, as set forth in the Complaint, relate to the controversy at issue.

- 3) Exercise of jurisdiction must be reasonable. It is fair and reasonable under the facts here for this Court to exercise jurisdiction. Witnesses live here. The heirs live here.

Order, pp. 7-8.

The great majority of courts agree with the foregoing analysis and repeatedly reject Ford's fringe argument. See *Ainsworth v. Moffett-Engineering, Ltd.*, 716 F.3d 174, 177 (5th Circ. 2013) (forklift manufactured by an Irish corporation, sold by a Delaware corporation in Ohio, caused an accident in Mississippi); *Mayeaux v. DRV, LLC*, 2016 WL 112704 (W.D. La. Jan. 8, 2016) (Louisiana had jurisdiction over defendant because product (a trailer), purchased out of state, injured a Louisiana resident, but defendant sold similar products in Louisiana, marketed trailers in Louisiana, and maintained a registered agent in Louisiana); *Bandemer v. Ford Motor Co.*, 913 N.W.2d 710, 715-16 (Minn. 2018) (jurisdiction of Ford affirmed in Minnesota although Ford manufactured and sold the vehicle in a different state, but was shown to have advertised, marketed and targeted Minnesota residents); *Mason v. Mooney Aircraft Corp.*, 2003 WL 21244160, at 8 (W.D. Mo. 2003) (Missouri permitted jurisdiction over out of state corporation despite the sale in another state because defendant sold the same type of aircraft in Missouri and it was

placed into the stream of commerce); *Blount v. TD Publishing Corp.*, 423 P.2d 421 (N.M. 1966) (“When a manufacturer voluntarily chooses to sell his product in a way which will be resold from dealer to dealer, transferred from hand to hand and transported from state to state, he cannot reasonably claim that he is surprised at being held to answer in any state for the damage the product causes.”); *Tarver v. Ford Motor Co.*, 2016 WL 7077045, at 5 (W.D. Okla. 2016) (Oklahoma permitted jurisdiction over Ford even though the vehicle was assembled in Missouri and sold in Indiana because Ford delivered vehicles into the stream of commerce with the expectation they would be purchased and used in Oklahoma, the vehicles were the subject of a national advertising campaign that included Oklahoma, and Ford operated dealerships in Oklahoma); *Antonin v. Ford Motor Co.*, 2017 WL 3633287, at 6 (M.D. Penn. 2017) (Pennsylvania jurisdiction over Ford affirmed where a Ford Explorer assembled in Kentucky and first sold in New York was used by a Pennsylvania resident in Pennsylvania resulting in injury because Ford was registered to do business in Pennsylvania, sold products in Pennsylvania, and advertised its products in Pennsylvania); *Harper v. Ford Motor Co.*, No. 2015-CP-40-03309 (S.C. 2015) (“The stream of commerce theory is not focused on a particular product, but on actions by a manufacturer to serve a market for its products. Because Ford manufactured and sold the subject vehicle with the reasonable expectation that it would be used in South Carolina and this action arises

from the product's use in South Carolina, Ford has sufficient contacts in South Carolina such that the exercise of jurisdiction comports with due process under the stream of commerce theory.”); *Semperit Technische Produkte Gesellschaft MB.H. v. Hennessy*, 508 S.W.3d 569, 582-84 (Tex. App. 2016) (defective product manufactured in Austria, sold to a New Jersey distributor, resold to an end-seller in Oklahoma, and later purchased by a non-party in Texas; Texas resident injured and sued in Texas; court properly exercised jurisdiction over Austrian defendant because it placed products in the stream of commerce with the knowledge they would reach Texas).

With the first two due process prongs satisfied, the District Court properly found its exercise of jurisdiction “reasonable.” Under the seven factors recognized in *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 476–77, 105 S.Ct. 2174, 2184–85: Ford’s purposeful interjection into Montana is substantial; the burden on Ford to litigate in Montana is not so great as to constitute a deprivation of due process; there is a significant burden on a decedent’s survivors and heirs if they are compelled to go to Michigan and Ohio to litigate; Montana has a strong interest in adjudicating this case because it has a strong interest in providing an effective means of redress for its citizens injured by defective products – *See Sternhagen v. Dow Co.*, 282 Mont. 168, 935 P.2d 1139 (1997), and *Phillips v. Gen. Motors Corp.*, 2000 MT 55, 298 Mont. 438, 995 P.2d 1002; the most efficient judicial resolution of the controversy

is in Montana where the witnesses are located; litigating in Montana protects Plaintiff's interests in a convenient forum; and it will be costly and inconvenient for Plaintiff to litigate in multiple alternative forums. Here, Ford fails to make the case that the District Court's exercise of jurisdiction was unreasonable.

II. FORD'S RELIANCE ON UNSOUND ARGUMENTS AND INAPPLICABLE LAW

Ford has been repeatedly cautioned by other courts around the country that the non-product cases it cites, such as *Walden v. Fiore*, 134 S.Ct. 1115 (2014), do not apply to a nationwide product seller, especially where the defendant is like Ford: a multinational corporation whose economic model is premised on the sale and use of its vehicles in all 50 states. One excellent example is *Thomas v. Ford Motor Co.*, 289 F. Supp. 3d 941 (E.D. Wis. 2017).

In *Thomas*, a Ford Flex was distributed by Ford to a dealership in Oklahoma. The dealership then sold the car to California-based Hertz Rent-A-Car. A Wisconsin resident later purchased the car, licensed it in Wisconsin, and was injured in Wisconsin. Making virtually the same arguments it makes now, Ford moved to dismiss for lack of personal jurisdiction. In rejecting Ford's arguments, the Wisconsin court noted these cases (referring to *Bristol Myers* and *Walden*) "did not alter the specific jurisdiction analysis in the way that Ford suggests." *Id.* at 946. The court emphasized that the nonresident plaintiffs in *Bristol-Myers* "were not prescribed Plavix in California, did not purchase Plavix in California, did not ingest

Plavix in California, and were not injured by Plavix in California;” and that absent a connection between the nonresident plaintiffs' claims and the forum State, specific jurisdiction is lacking. The District Court made the same distinction, and noted that “The facts in this case align with the requirement set forth by Justice Alito in *Bristol-Myers Squibb*: ‘What is needed--... is a connection between the forum and the specific claims at issue.’” Order at page 10.

Ford also relies on *Pitts v. Ford Motor Co.*, 127 F.Supp. 3d 676 (S.D. Miss. 2015), and *Cahen v. Toyota Motor Corp.*, 147 F.Supp. 3d 955 (N.D. Cal. 2015), both cases were easily distinguished in *Rhodehouse v. Ford Motor Co.*, No. 216CV01892JAMCMK, 2016 WL 7104238, at *3 (E.D. Cal. Dec. 5, 2016). In *Rhodehouse*, jurisdiction was found in California where the Ford vehicle, which was originally sold in Canada, injured a California resident after the vehicle was transported in the stream of commerce to California and purchased. The Court emphasized that Ford’s systematic activities in California made it likely that many of its vehicles sold in other forums would end up owned, registered, and operated in California. The *Roadhouse* opinion notes that the *Pitts* accident occurred in Mississippi, but the plaintiffs did not reside in Mississippi, and there was no evidence that the car was registered in Mississippi. As for *Cahen*, it was inapposite because plaintiffs there did not even address or oppose Ford’s contention that specific jurisdiction did not exist. The *Rhodehouse* court noted that “Ford has

strong and pervasive connections to California, i.e. Ford ‘specifically seeks, or expects’ to sell its cars in California. In light of these strong connections, the fact that the accident injured a California resident and occurred in the state of California in a California-registered vehicle sufficiently establishes a nexus between Ford’s contacts with California and Mr. Rhodehouse's claims.” *Id.*, at *4.

West Virginia is yet another example of a court that has outright rejected Ford’s recycled and odd argument against personal jurisdiction. In *State ex rel. Ford Motor Co. v. McGraw*, 788 S.E.2d 319, 343 (W.Va. 2016), the West Virginia court expressly rejected the logic used in *Pitts*, noting that it “unreasonably limits state authority”, and that the court would “[d]ecline[d] to use the place of sale as a per se rule to defeat specific jurisdiction” because such a rule is “so rigid and formalistic as to undermine the precedent of *World-Wide* and its progeny” and “utterly ignores the ‘targeting’ of a forum for the purpose of developing a market.” The “focus in a stream of commerce or stream of commerce plus analysis is not the discrete individual sale, but, rather, the development of a market for products in a forum.”

Contrary to Ford’s argument, the stream-of-commerce test does not require that the product must first be sold in Montana; instead, “the stream-of-commerce cases focus on whether a seller’s placement of its product into the stream of commerce constitutes minimum contacts when *the product travels into and causes*

harm in the forum state.” TV Azteca v. Ruiz, 490 S.W.3d 29, 54 (Tex. 2016), cert. denied, 137 S. Ct. 2290 (2017) (emphasis added).

CONCLUSION

Montana must protect its citizens’ rights of redress when injured by out-of-state tortfeasors who target Montana for personal gain. Despite flooding Montana with its products, Ford now seeks legal asylum and suggests Plaintiff must chase redress in Michigan, Ohio, and Montana. Such a preposterous result must be rejected in the strict products liability, stream of commerce context. Jurisdiction over Ford should be affirmed.

Respectfully submitted this 13th day of March, 2019.

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CERTIFICATE OF COMPLIANCE

Pursuant to Rule 11(4)(e) of the Montana Rules of Appellate Procedure, I certify that this brief is printed with a proportionately spaced Times New Roman text typeface of 14 points; is double spaced, except for the quoted and indented material; has left, right, top and bottom margins of one inch; and the word count calculated by Microsoft Word is not more than 4,000 words, excluding the Table of Contents, Table of Authorities, Certificate of Compliance, Certificate of Service, and Appendix.

Dated this 13th day of March, 2019.

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CERTIFICATE OF SERVICE

I, Dennis P. Conner, hereby certify that I have served true and accurate copies of the foregoing Response/Objection - Petition for Writ to the following on 03-13-2019:

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