

Courts Continue to Grapple with Constitutional Limits of Personal Jurisdiction

In three recent opinions, two state and one federal, courts reached different results on the constitutional limits of courts exercising personal jurisdiction. All involved the same product and defendant, LG Chem Ltd. and its 18650 lithium-ion batteries. By way of background, LG claims those batteries were not designed for consumer use. Still, such batteries have been used in vaping products throughout the country and have allegedly caused serious personal injuries after exploding.

The opinions were from a federal district court judge in Missouri, the Ohio Supreme Court, and an intermediate California Appellate Court. The Ohio and California decisions were appeals of trial court orders allowing personal jurisdiction, with the Ohio Supreme Court rejecting a mandate and the California appellate court overturning the grant of personal jurisdiction. The Missouri federal judge denied LG's Motion to Dismiss.

The cases collectively provide an update on the present state of the law and highlight that courts are reaching different results on the same issues depending on slightly different facts, interpretation of those facts, or a different interpretation of the legal standards. Links to the opinions are attached below:

- [California Opinion](#)
- [Ohio Opinion](#)
- [Missouri Opinion](#)

Subrogation professionals and their counsel need to stay abreast of the shifting tides on the issue of personal jurisdiction.



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