No. 100930-5

SUPREME COURT
OF THE STATE OF WASHINGTON

SANDRA LYNNE DOWNING, individually and as Personal Representative of The Estate of Brian Downing, deceased, and on behalf of KRISTYL DOWNING and JAMES DOWNING, Death Beneficiaries of The Estate of Brian Downing,
Respondents,

v.

BLAIR LOSVAR, Personal Representative of THE ESTATE OF ALBERT E. LOSVAR, deceased,
Respondent,

LYCOMING, A DIVISION OF AVCO CORPORATION, a Delaware corporation and subsidiary of TEXTRON, INC., a foreign corporation,
Defendant,

TEXTRON AVIATION, INC., a Kansas corporation, formerly CESSNA AIRCRAFT COMPANY,
Appellant.

DOWNING RESPONDENTS' ANSWER TO PETITION FOR REVIEW

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I. IDENTITY OF RESPONDENTS

The Respondents are Sandra Lynne Downing, individually and as Personal Representative of the Estate of Brian Downing, deceased, and on behalf of Kristyl Downing and James Downing, Death Beneficiaries of the Estate of Brian Downing (the "Downings"). The Downings were plaintiffs in the trial court and respondents in the Court of Appeals.

II. ISSUE PRESENTED FOR REVIEW

When an out-of-state manufacturer's product malfunctions and injures a Washington resident, whether *Ford Motor Co. v. Montana Eighth Judicial District Court* requires a showing that the out-of-state manufacturer purposefully and systematically served the Washington market for the specific product line to which the defective product belongs rather than the Washington market for that class of products generally.

III. STATEMENT OF THE CASE

The jurisdictional facts of *Ford Motor Co. v. Montana Eighth Judicial District Court*, 141 S. Ct. 1017 (2021), are

materially indistinguishable from those presented here. Both here and in *Ford* an out-of-state vehicle manufacturer made extensive contacts with the forum state through advertising, marketing, sales, and after-sale customer support. Both here and in *Ford* the accident vehicle was designed, manufactured, and initially sold out-of-state. Both here and in *Ford* that vehicle entered the forum state and injured forum residents. And both here and in *Ford* the question presented was whether the forum states' courts can exercise personal jurisdiction over the out-of-state manufacturer in a suit alleging a defect in the vehicle caused the injuries.

In *Ford*, the U.S. Supreme Court answered that question in the affirmative and held that Montana and Minnesota courts could exercise personal jurisdiction over Ford for claims arising out of accidents in those states involving its vehicles. The Court of Appeals merely followed *Ford*'s holding when it held that a Washington court could exercise personal jurisdiction over Textron Aviation, Inc. ("TAI") in a lawsuit alleging a

defect in one of TAI's Cessna T182T model aircraft caused a crash in Washington that killed Albert Losvar and Brian Downing.

The TAI aircraft that crashed was one of over 3,000 TAI aircraft registered in Washington. *Downing v. Losvar*, No. 36298-1-III, slip op. at 12 (Apr. 14, 2022).[1] Washington—particularly Eastern Washington, due to its flat terrain and access to landing areas—is a popular market for general aviation piston aircraft such as the Cessna T182T that crashed here. *See id.* Accordingly, even after manufacturing, marketing, selling, and delivering its aircraft to customers, TAI continues to provide after-sale customer support to owners of its aircraft in Washington.

Indeed, TAI sells itself as providing "excellent customer support," *id.*, and it provides this support directly to Washington-based aircraft owners in many ways. One is by

[1] TAI attached a copy of the Court of Appeals' opinion to its appendix to its petition for review.

authorizing seven Cessna service centers in Washington and identifying their locations on the TAI website (Everett, Kenmore, Renton, Pullman, Gig Harbor, Seattle, and Vancouver). *Id.* at 10. Another is by sending notices to Washington-based owners of its aircraft advising them of safety and maintenance issues. During Mr. Losvar's ownership of his Cessna T182T aircraft, TAI sent Mr. Losvar at least six such notices regarding safety and maintenance issues with his aircraft. *Id.* at 4. A third way TAI provides customer support is by maintaining a "mobile response team" in Washington that travels throughout the state to address aircraft maintenance and other issues. *Id.* at 12. Mobile response teams are only located in states with a significant market for TAI aircraft. *Id.* The teams themselves are a form of advertising for TAI. *Id.* The team's vehicles and uniforms are highly branded and operate as a "mobile billboard" for the company. *Id.*

The Court of Appeals considered the foregoing contacts (and others) in light of the Supreme Court's analysis in *Ford*

and correctly concluded that Washington courts can exercise personal jurisdiction over TAI in this case.

IV. ARGUMENT

A. Standard of Review.

RAP 13.4(b) identifies four bases upon which this Court will accept a petition for review:

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
>
> (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or
>
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
>
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

The first two bases are inapplicable here because the Court of Appeals' decision does not conflict with any decision of the Supreme Court or the Court of Appeals. Recognizing this, TAI seeks review under only RAP

13.4(b)(3) and (b)(4). Pet. for Rev. at 3. These latter two bases for review are not satisfied either.

B. The Court of Appeals' Decision Does Not Raise Any Constitutional Issues or Issues of Substantial Public Interest that the U.S. Supreme Court Did Not Already Decide in *Ford*.

Simply put, the issues presented in this case have already been decided by the U.S. Supreme Court in *Ford*. Therefore, there is nothing for this Court to decide. TAI cannot dispute that *Ford*'s holding is binding here so it instead argues that the Court of Appeals misinterpreted *Ford*. TAI is incorrect.

1. Ford *Does Not Impose a Model-Specific Test for Specific Jurisdiction.*

TAI's core argument is this: that under *Ford*, a plaintiff seeking to invoke specific personal jurisdiction over an out-of-state manufacturer for injuries caused by a defective product must show that the manufacturer systematically served the market for the same model of the product at issue rather than the market for the same class of products generally.

A fair reading of the entire *Ford* opinion makes clear that the Supreme Court held no such thing. The Court resolved the cases before it "by proceeding as the Court has done for the last 75 years—applying the standards set out in *International Shoe* and its progeny, with attention to their underlying values of ensuring fairness and protecting interstate federalism." *Ford*, 141 S. Ct. at 1025 n.2. In other words, the Court made clear it was not introducing a new test or otherwise changing the approach to analyzing specific personal jurisdiction cases.

Consistent with its declaration, the Court's specific jurisdiction analysis flowed from the analytical framework established in its prior cases. To exercise specific jurisdiction, a court must first determine whether the defendant has taken "some act by which [it] purposefully avails itself of the privilege of conducting activities within the forum State." *Ford*, 141 S. Ct. at 1024 (quoting *Hanson v. Denckla*, 357 U.S. 235, 253 (1984)). Those contacts "must be the defendant's own choice and not 'random, isolated, or fortuitous.'" *Id.* at 1025

(quoting *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 774 (1984)). In other words, the defendant must have "deliberately 'reached out beyond' its home—by, for example, 'exploi[ting] a market' in the forum State or entering a contractual relationship centered there." *Id.* (quoting *Walden v. Fiore*, 571 U.S. 277, 285 (2014)).

From these contacts, the court must then determine whether the plaintiff's claims "arise out of or relate to the defendant's contacts" with the forum State. *Id.* (citations omitted). In other words, "there must be 'an affiliation between the forum and the underlying controversy, principally, [an] activity or an occurrence that takes place in the forum State and is therefore subject to the State's regulation.'" *Id.* (quoting *Bristol-Myers Squibb Co. v. Superior Court of Cal.*, 137 S. Ct. 1773, 1780 (2017)).

Fundamentally, the foregoing analytical framework allows a court to determine two things: (1) whether the defendant is exercising the privilege of conducting activities

within a state, thus enjoying the benefits and protection of its laws, such that the state may hold the defendant accountable for related misconduct; and (2) whether the defendant has fair warning that a particular activity in a state may subject it to that state's jurisdiction. *See id.*

Nothing about this analysis requires that a plaintiff's claims arise out of or relate to a defendant's contacts in a particular way. Nor does the framework exclude certain contacts from consideration. And in fact, the Supreme Court considered all of Ford's contacts with Montana and Minnesota in its specific jurisdiction analysis:

> By every means imaginable—among them, billboards, TV and radio spots, print ads, and direct mail—Ford urges Montanans and Minnesotans to buy its vehicles, including (at all relevant times) Explorers and Crown Victorias. Ford cars—again including those two models—are available for sale, whether new or used, throughout the States, at 36 dealerships in Montana and 84 in Minnesota. And apart from sales, Ford works hard to foster ongoing connections to its cars' owners. The company's dealers in Montana and Minnesota (as elsewhere) regularly maintain and repair Ford cars, including those whose warranties have long

> since expired. And the company distributes replacement parts both to its own dealers and to independent auto shops in the two States. Those activities, too, make Ford money. And by making it easier to own a Ford, they encourage Montanans and Minnesotans to become lifelong Ford drivers.

Ford, 141 S. Ct. at 1028.

The foregoing paragraph encapsulates the scope of what the Court considered, and the Court did not limit itself to contacts specific to the Ford Explorer in Montana or the Ford Crown Victoria in Minnesota. Rather, the Court considered the full extent of Ford's activities in Montana and Minnesota as it related to the marketing, sale, and servicing of Ford *vehicles*, including the Explorer and the Crown Victoria.[2] The Court's consideration of all of Ford's Montana and Minnesota activities flowed naturally from its preceding discussion of how specific jurisdiction cases are to be analyzed.

[2] The Court's opinion also began with a summary of Ford's extensive business operations which were not limited to Ford Explorers or Ford Crown Victorias. *See Ford*, 141 S. Ct. at 1022–23.

It is true that the Court's finding of specific jurisdiction relied, in part, on Ford's Montana and Minnesota contacts specific to the Ford Explorer and the Ford Crown Victoria. But this is unsurprising given that the defective vehicles at issue were a Ford Explorer and a Ford Crown Victoria, and the Court was analyzing whether the plaintiffs' claims arose out of or related to Ford's Montana and Minnesota contacts. This does not mean that those were the only relevant contacts or that jurisdiction can only arise out of contacts specific to a particular model of a particular product a defendant sells in the forum. Indeed, the Court noted that Ford's extensive marketing and support of its vehicles in Montana and Minnesota generally could encourage their residents to purchase Ford vehicles and give rise to claims:

> For the owners of these cars might never have bought them, and so these suits might never have arisen, except for Ford's contacts with their home States. Those contacts might turn any resident of Montana or Minnesota into a Ford owner—even when he buys his car from out of state. He may make that purchase because he saw ads for the car

> in local media. And he may take into account a raft of Ford's in-state activities designed to make driving a Ford convenient there: that Ford dealers stand ready to service the car; that other auto shops have ample supplies of Ford parts; and that Ford fosters an active resale market for its old models.

Ford, 141 S. Ct. at 1029.

It is also worth noting that the case the Supreme Court relied on most, *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286 (1980), did not itself distinguish between different models of Audis or Volkswagens in analyzing the personal jurisdiction question before it. As the Court in *Ford* summarized:

> [I]f Audi and Volkswagen's business deliberately extended into Oklahoma (among other States), then Oklahoma's courts could hold the companies accountable for a car's catching fire there—even though the vehicle had been designed and made overseas and sold in New York. For, the Court explained, a company thus "purposefully avail[ing] itself" of the Oklahoma auto market "has clear notice" of its exposure in that State to suits arising from local accidents involving its cars.

141 S. Ct. at 1027.

Likewise, the Court's citation to *Daimler AG v. Bauman*, 571 U.S. 117 (2014), for its articulation of the "paradigm" case of specific jurisdiction did not describe a model-specific fact pattern: "[I]f a California plaintiff, injured in a California accident involving a Daimler-manufactured vehicle, sued Daimler in California court alleging that the vehicle was defectively designed, that court's adjudicatory authority would be premised on specific jurisdiction." *Id.* at 127 n.5.

Hood v. American Auto Care, LLC, 21 F.4th 1216 (10th Cir. 2021), the Tenth Circuit case cited by TAI, is not to the contrary.[3] In *Hood*, the plaintiff sued a Florida defendant in Colorado over telemarketing calls the defendant had directed towards Vermont. *See id.* at 1220. Like TAI does here, the defendant in *Hood* argued to the court that *Ford* imposed a model-specific test and the telemarketing calls to Vermont

[3] TAI's two other cited cases, *LNS Enterprises LLC v. Continental Motors, Inc.*, 22 F.4th 852 (9th Cir. 2022), and *Miller v. LG Chem, Ltd.*, 868 S.E.2d 896 (N.C. Ct. App. 2022), are addressed in the following section.

phone numbers were not the same "model" of call as those made to Colorado phone numbers. *Id.* at 1225.

The Tenth Circuit rejected the defendant's argument, and in analyzing *Ford*, the court did not adopt a model-specific test. Rather, the court held:

> We understand *Ford* to adopt the proposition that the forum State can exercise personal jurisdiction over an out-of-state defendant that has injured a resident plaintiff in the forum State if (1) the defendant has purposefully directed activity to market a product or service at residents of the forum State and (2) the plaintiff's claim arises from essentially the same type of activity, even if the activity that gave rise to the claim was not directed at forum residents. In that circumstance, we say that the activity giving rise to the claim "relates" to the defendant's activity in the forum State.

Id. at 1224. Applying this test, the court concluded that personal jurisdiction could be exercised over the Florida defendant even though the activity causing harm was directed at Vermont because that activity, per the court's test, was "essentially identical" to the activity directed at Colorado. *Id.* The court did go on to say that, because the activities were

"essentially the same," they could be considered the same "model" of call. Id. at 1225. However, that was only in response to the defendant's argument that *Ford* demanded a model-specific test; the court did not adopt such a test for analyzing specific jurisdiction.

In sum, the Supreme Court's opinion in *Ford*, fairly read, does not impose a model-specific test for specific jurisdiction. Rather, it calls on courts to apply the existing analytical framework for specific jurisdiction and consider all of a defendant's forum contacts in determining whether the plaintiff's claims "arise out of or relate to" those contacts.

2. *Even if a Model-Specific Test Applies, It Is Satisfied Here.*

Even accepting TAI's position that a model-specific test applies, the exercise of personal jurisdiction over TAI in this case would still be appropriate. Because there was no evidentiary hearing before the trial court, Respondents' burden is only that of a prima facie showing of jurisdiction. *State v. LG Elecs., Inc.*, 186 Wn.2d 169, 176, 375 P.3d 1035 (2016).

And in considering a CR 12(b)(2) motion to dismiss for lack of personal jurisdiction, "[t]he allegations in [the plaintiff's] complaint must be taken as correct for purposes of appeal." *MBM Fisheries, Inc. v. Bollinger Mach. Shop and Shipyard, Inc.*, 60 Wn. App. 414, 418, 804 P.2d 627 (1991). Courts must also view the evidence and draw reasonable inferences in the light most favorable to the nonmoving party. *See CTVC of Hawaii, Co., Ltd. v. Shinawatra*, 82 Wn. App. 699, 708, 919 P.2d 1243 (1996). Where, as in this case, there has been no jurisdictional discovery, the complaint should survive "if any state of facts could exist under which [jurisdiction] could be sustained." *LG Elecs.*, 186 Wn.2d at 183 (citations omitted) (applying the standard for CR 12(b)(6) motions to CR 12(b)(2) motions).

As noted above, TAI has substantial contacts with Washington. There are over 3,000 TAI aircraft registered in Washington, a popular market for general aviation piston aircraft such as the Cessna T182T that crashed in this case. In

addition to manufacturing, marketing, and selling its aircraft to customers, TAI provides after-sale customer support to owners of its aircraft in Washington. There are seven authorized Cessna service centers in Washington. TAI sends notices to Washington-based aircraft owners advising them of safety and maintenance issues. This includes notices concerning the Cessna T182T model aircraft. At least six such notices were sent to Mr. Losvar regarding the Cessna T182T at issue in this case. Moreover, TAI maintains a highly branded "mobile response team" in Washington that travels throughout the state to address aircraft maintenance and other issues. In doing so, the mobile response team also serves as a "mobile billboard" advertising TAI and its aircraft to Washington residents.

In light of these contacts, the Court of Appeals reasonably inferred that TAI marketed, sold, and serviced the Cessna T182T model aircraft in Washington and that Mr. Losvar's specific T182T aircraft was one of many that made its way into the state. Although TAI's attorney argued that TAI

currently markets and services only expensive business jets in Washington, there is nothing in the record to support this argument. *See Downing v. Losvar*, slip op. at 27 ("Textron Aviation presented no testimony establishing this limitation of product sales and service."). On the contrary, the record contained substantial evidence that Textron marketed its full roster of aircraft models to customers in Washington, including the Cessna T182T. *See id.* at 9–10. Moreover, TAI did not deny "that it sold and serviced scores of Cessna T182T Skylanes in Washington State at the time Albert Losvar purchased his Cessna aircraft."[4] *Id.*

Contrast this with the record in *LNS Enterprises LLC v. Continental Motors, Inc.*, 22 F.4th 852, 864 (9th Cir. 2022), in which TAI submitted declarations and affidavits establishing that its only contact with Arizona was "a single service center," or the record in *Miller v. LG Chem, Ltd.*, 868 S.E.2d 896, 902

[4] TAI now argues that it did not sell the Cessna T182T in Washington, *see* Pet. for Rev. at 2, but again, there is no evidence in the record to support such an argument.

(N.C. Ct. App. 2022), in which the defendants produced unrefuted evidence in discovery that they did not promote, distribute, or sell their batteries in North Carolina for individual use. Unlike the defendants in *LNS* or *LG Chem*, TAI failed to submit any declarations or affidavits to support its contention that it never marketed, sold, or serviced the Cessna T182T in Washington or to Washington-based customers. TAI's allegations alone are insufficient to avoid jurisdiction. *See LNS*, 22 F.4th at 862 (declining to consider the plaintiff's allegations of TAI's contacts with Arizona because they were "not among 'the original papers and exhibits filed in the district court' or in 'the transcript of proceedings'").

Accordingly, even under a model-specific analysis, the Court of Appeals properly held that Washington courts can exercise personal jurisdiction over TAI in this case. There is no basis upon which this Court should grant review.

V. CONCLUSION

This Court should deny the petition for review.

I hereby certify the foregoing contains 3,130 words in compliance with RAP 18.17.

Respectfully submitted this 15th day of June, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2022, I electronically filed the foregoing Downing Respondents' Answer to Petition for Review with the Clerk of the Court using the E-Filing system and served the foregoing as follows:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 15th day of June, 2022, at Seattle, Washington.

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