

Helicopteros Nacionales de Colombia, S.A. v. Hall
Columbian corporation (D) v. Helicopter crash victim (P)
466 U.S. 408 (1984).

NATURE OF CASE: Appeal from finding of jurisdiction in wrongful death action.

RULE OF LAW: Contract negotiations, personnel training, and equipment purchases alone do not constitute sufficient minimum contacts to confer jurisdiction when they do not arise out of or relate to the cause of action.

FACTS: Helicopteros (D), a Colombia corporation, was engaged in the transport of personnel and materials for Consorcio (D), which was involved in a pipeline project. During the course of negotiations, Helicopteros (D) sent executives for negotiation in Houston. It also purchased spare parts from a Texas helicopter company. It trained personnel in Fort Worth, and several checks it deposited were drawn on Texas banks. A helicopter crash occurred, and Hall (P) filed suit in a Texas court for a death caused by the crash. A verdict against Helicopteros (D) was rendered. The court of appeals reversed, holding jurisdiction did not exist. The Supreme Court of Texas reversed.

ISSUE: Do contract negotiations, personnel training, and equipment purchases alone constitute sufficient minimum contacts to confer jurisdiction when they do not arise out of or relate to the cause of action?

HOLDING AND DECISION: (Blackmun, J.) No. Contract negotiations, personnel training, and equipment purchases alone do not constitute sufficient minimum contacts to confer jurisdiction when they do not arise out of or relate to the cause of action. When a controversy does not arise out of or relate to a defendant's contacts with a forum, the contacts must be of a systematic and continuous nature to allow for jurisdiction to exist. Here, the controversy did not arise out of or relate to the contacts. Further, the contacts were of an ad hoc, noncontinuous nature. They related to specific projects. For this reason, the contacts were insufficient to confer jurisdiction. Reversed.

DISSENT: (Brennan, J.) It is incorrect to say that the contacts did not relate to the controversy. The contacts were made pursuant to the project in which the crash occurred.

ANALYSIS

For almost all of the time in which the Court had dealt with personal jurisdiction, it did not distinguish between the nature of the contacts involved. The dichotomy between a controversy's relation to the contacts was firmly established in quasi in rem actions in *Shaffer v. Heitner*, 433 U.S. 186 (1977). As this case demonstrates, it is now firmly established in the in personam arena as well.