

SUMMARY STATEMENT

H2O Environmental, Inc. v. Proimtu MMI, LLC, Docket No. 44148

H2O appealed the dismissal of its suit against Proimtu for lack of personal jurisdiction and the district court's refusal to vacate the judgment dismissing the case. H2O and Proimtu are Nevada companies that contracted for employment services related to the construction of a solar power plant in Tonapah, Nevada. Despite being a Nevada company, H2O's principal place of business is in Boise, Idaho and all the services contemplated under the contract were performed in H2O's Boise office. When H2O failed to receive reimbursement for its payment of back-taxes for misclassified Proimtu employees, it filed suit in Idaho. The district court dismissed the suit for lack of personal jurisdiction, citing a lack of minimum contacts between Proimtu and the State of Idaho. The Supreme Court disagreed, holding that Proimtu had adequate advance notice of H2O's intent to complete its duties under the contract in Idaho and failed to object or seek services elsewhere, which amounted to purposefully availing itself of the benefits and protections of Idaho law. Accordingly, it vacated the judgment of the district court dismissing the case and remanded for proceedings consistent with its opinion.