gal action, and has traditionally been deemed necessary in actions styled *in personam*.[947] But "certain less rigorous notice procedures have enjoyed substantial acceptance throughout our legal history; in light of this history and the practical obstacles to providing personal service in every instance," the Court in some situations has allowed the use of procedures that "do not carry with them the same certainty of actual notice that inheres in personal service."[948] But, whether the action be *in rem* or *in personam*, there is a constitutional minimum; due process requires "notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections."[949]

The use of mail to convey notice, for instance, has become quite established,[950] especially for assertion of *in personam* jurisdiction extraterritorially upon individuals and corporations having "minimum contacts" with a forum state, where various "long-arm" statutes authorize notice by mail.[951] Or, in a class action, due process is satisfied by mail notification of out-of-state class members, giving such mem-

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& Trust Co., 339 U.S. 306, 314 (1950). "There . . . must be a basis for the defendant's amenability to service of summons. Absent consent, this means there must be authorization for service of summons on the defendant." Omni Capital Int'l v. Rudolph Wolff & Co., 484 U.S. 97 (1987).

[947] McDonald v. Mabee, 243 U.S. 90, 92 (1971).

[948] Greene v. Lindsey, 456 U.S. 444, 449 (1982). *See* Dusenbery v. United States, 534 U.S. 161 (2001) (upholding a notice of forfeiture that was delivered by certified mail to the mailroom of a prison where the individual to be served was incarcerated, even though the individual himself did not sign for the letter).

[949] Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950). Thus, in Jones v. Flowers, 547 U.S. 220 (2006), the Court held that, after a state's certified letter, intended to notify a property owner that his property would be sold unless he satisfied a tax delinquency, was returned by the post office marked "unclaimed," the state should have taken additional reasonable steps to notify the property owner, as it would have been practicable for it to have done so. And, in Greene v. Lindsey, 456 U.S. 444 (1982), the Court held that, in light of substantial evidence that notices posted on the doors of apartments in a housing project in an eviction proceeding were often torn down by children and others before tenants ever saw them, service by posting did not satisfy due process. Without requiring service by mail, the Court observed that the mails "provide an 'efficient and inexpensive means of communication' upon which prudent men will ordinarily rely in the conduct of important affairs." Id. at 455 (citations omitted). *See also* Mennonite Bd. of Missions v. Adams, 462 U.S. 791 (1983) (personal service or notice by mail is required for mortgagee of real property subject to tax sale, Tulsa Professional Collection Servs. v. Pope, 485 U.S. 478 (1988) (notice by mail or other appropriate means to reasonably ascertainable creditors of probated estate).

[950] *E.g.*, McGee v. International Life Ins. Co., 355 U.S. 220 (1957); *Travelers Health Ass'n ex rel. State Corp. Comm'n*, 339 U.S. 643 (1950).

[951] *See*, *e.g.*, G.D. Searle & Co. v. Cohn, 455 U.S. 404, 409–12 (1982) (discussing New Jersey's "long-arm" rule, under which a plaintiff must make every effort to serve process upon someone within the state and then, only if "after diligent inquiry and effort personal service cannot be made" within the state, "service may be made by mailing, by registered or certified mail, return receipt requested, a copy of the sum-