sence of such designation, by accepting service upon corporate agents authorized to operate within the state.[877] Further, by doing business in a state, the corporation was deemed to be present there and thus subject to service of process and suit for transactions conducted there.[878] This theoretical corporate presence conflicted with the idea of corporations having no existence outside their state of incorporation, but it was nonetheless accepted that a corporation "doing business" in a state to a sufficient degree was "present" for service of process upon its agents in the state who carried out that business.[879]

Presence alone, however, does not expose a corporation to all manner of suits through the exercise of general jurisdiction. Only corporations whose continuous and systematic affiliations with a forum make them "essentially at home" there are broadly amenable to suit.[880] Without the protection of such a rule, foreign corporations would be exposed to the manifest hardship and inconvenience of defending, in any state in which they happened to be carrying on business, suits for torts wherever committed and claims on contracts wherever made.[881] And if the corporation stopped doing business in the forum state before suit against it was commenced, it

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[877] Lafayette Ins. Co. v. French, 59 U.S. (18 How.) 404 (1855); St. Clair v. Cox, 106 U.S. 350 (1882); Commercial Mutual Accident Co. v. Davis, 213 U.S. 245 (1909); Simon v. Southern Ry., 236 U.S. 115 (1915); Pennsylvania Fire Ins. Co. v. Gold Issue Mining Co., 243 U.S. 93 (1917).

[878] Presence was first independently used to sustain jurisdiction in International Harvester Co. v. Kentucky, 234 U.S. 579 (1914), although the possibility was suggested as early as St. Clair v. Cox, 106 U.S. 350 (1882). *See also* Philadelphia & Reading Ry. v. McKibbin, 243 U.S. 264, 265 (1917) (Justice Brandeis for Court).

[879] *E.g.*, Pennsylvania Fire Ins. Co. v. Gold Issue Mining & Milling Co., 243 U.S. 93 (1917); St. Louis S.W. Ry. v. Alexander, 227 U.S. 218 (1913).

[880] Daimler AG v. Bauman, 571 U.S. ___, No. 11–965, slip op. (2014) *quoting* Goodyear Dunlop Tires Operations, S.A. v. Brown, 564 U.S. ___, No. 10–76, slip op. at 2 (2011) (U.S. subsidiary of Daimler doing substantial business in California not subject to suit there with respect to acts taken in Argentina by Argentinian subsidiary of Daimler).

[881] *E.g.*, Old Wayne Life Ass'n v. McDonough, 204 U.S. 8 (1907); Simon v. Southern Railway, 236 U.S. 115, 129–130 (1915); Green v. Chicago, B. & Q. Ry., 205 U.S. 530 (1907); Rosenberg Co. v. Curtis Brown Co., 260 U.S. 516 (1923); Davis v. Farmers Co-operative Co., 262 U.S. 312 (1923); Helicopteros Nacionales de Colombia v. Hall, 466 U.S. 408 (1984). Continuous operations were sometimes sufficiently substantial and of a nature to warrant assertions of jurisdiction. St. Louis S.W. Ry. v. Alexander, 227 U.S. 218 (1913). *See also* Goodyear Dunlop Tires Operations, S.A. v. Brown, 564 U.S. ___, No. 10–76, slip op. (2011) (distinguishing application of stream-of-commerce analysis in specific cases of in-state injury from the degree of presence a corporation must maintain in a state to be amenable to general jurisdiction there).