
IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA

STATE OF WEST VIRGINIA ex rel. TAKEUCHI MANUFACTURING COMPANY,
LIMITED,
Petitioner,

v.

THE HONORABLE DAVID J. SIMS; DONALD A. BRADEN; FRANCES BRADEN;
TAKEUCHI MANUFACTURING U.S. LIMITED; and CONTRACTOR'S
CONNECTION, LLC,
Respondents.

From the Circuit Court of Ohio County, West Virginia
Civil Action No. CC-35-2023-C-153

SUMMARY RESPONSE OF RESPONDENT CONTRACTOR'S CONNECTION, LLC

MINTZER SAROWITZ ZERIS & WILLIS PLLC

BY: /s/ Bradley K. Shafer

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SUMMARY RESPONSE OF RESPONDENT CONTRACTOR'S CONNECTION, LLC

Now Comes Respondent Contractor's Connection, LLC, through its undersigned counsel of record, pursuant to the Scheduling Order entered by this Honorable Court on August 19, 2025 and Rule of Appellate Procedure 16(h) to provide this Summary Response.

QUESTIONS PRESENTED:

1. Is it clear legal error for the Circuit Court to forego the necessary constitutional due process analysis when ruling on a foreign corporation's motion to dismiss for lack of personal jurisdiction?

2. Is it clear legal error for a Circuit Court to use the contacts of a subsidiary corporation to find that the parent corporation has sufficient minimum contacts with the state of West Virginia to permit the assertion of personal jurisdiction over the parent corporation?

CONCLUSION:

The Writ of Prohibition filed by Petitioner Takeuchi Manufacturing Company, Limited concerns the issue of whether or not the Ohio County Circuit Court has personal jurisdiction over it. Respondent has not filed a cross claim against the Petitioner and therefore takes no position on this dispute.

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LLC*

Date: 9/8/2025

MSZ&W File No. 6399.0003

CERTIFICATE OF SERVICE

I, Bradley K. Shafer, hereby certify that the foregoing **Summary Response of Respondent Contractor's Connection, LLC** was electronically filed with the Court on September 8, 2025, via File & ServeXpress, and served, via U.S. Mail and/or E-Mail, upon the following:

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