

TABLE 1

States and Choice-of-Law Methodologies Followed

	Traditional	Significant Contacts	Restatement 2nd	Interest Analysis	Lex Fori	Better Law	Combined Modern
Alabama	T + C						
Alaska			T + C				
Arizona			T + C				
Arkansas		C				T	
California				T			C
Colorado			T + C				
Connecticut			T + C				
Delaware			T + C				
DC				T			C
Florida	C		T				
Georgia	T + C						
Hawaii							T + C
Idaho			T + C				
Illinois			T + C				
Indiana		T + C					
Iowa			T + C				
Kansas	T + C						
Kentucky			C		T		
Louisiana							T + C
Maine			T + C				
Maryland	T + C						
Massachusetts							T + C
Michigan			C		T		
Minnesota						T + C	
Mississippi			T + C				
Missouri			T + C				
Montana			T + C				
Nebraska			T + C				
Nevada		C	T				
New Hampshire			C			T	
New Jersey			T				C
New Mexico	T + C						
New York							T + C
North Carolina	T	C					
North Dakota		T					C
Ohio			T + C				
Oklahoma	C		T				
Oregon							T + C
Pennsylvania							T + C
Puerto Rico							T + C
Rhode Island	C					T	
South Carolina	T + C						
South Dakota			T + C				
Tennessee	C		T				
Texas			T + C				
Utah			T + C				
Vermont			T + C				
Virginia	T + C						
Washington			T + C				
West Virginia	T		C				
Wisconsin						T + C	
Wyoming			T + C				
Total Torts	9	2	25	2	2	5	7
Total Contracts	11	4	24	0	0	2	11

T = Torts

C = Contracts

Methodologies

Traditional. These states generally follow the rule of *lex loci delicti* for torts and the rule of *lex loci contractus* for contracts.

Significant Contacts. These states apply the law of the state that has the most significant contacts with the parties and the relevant events. They do not consider state policies or state interests.

Restatement Second. These states follow the approach set forth in the *Restatement (Second) of Conflict of Laws*.

Interest Analysis. These states apply a modified version of the governmental-interest analysis first proposed by Brainerd Currie.

Lex Fori. These states follow a strong presumption in favor of the law of the forum.

Better Law. These states apply the choice-influencing considerations first proposed by Robert Leflar, including the better law criterion.

Combined Modern. These states follow a combination of approaches that are not the traditional approach, e.g. interest analysis plus the *Restatement (Second) of Conflict of Laws*, functional approach, et al.