
Dynegy Midstream Services, LP v. Trammochem, No. 05-3544-cv (2d Cir. June 13, 2006)

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On June 13, 2006, the United States Court of Appeals for the Second Circuit addressed the issue of the permissibility of nationwide service of process under Section 7 of the Federal Arbitration Act ("FAA") in *Dynegy Midstream Services, LP v. Trammochem*. Finding that the FAA does not authorize nationwide service of process, the court reversed the decision of the United States District Court for the Southern District of New York, which had ordered compliance with a subpoena duces tecum issued by an FAA arbitration panel based on its interpretation of FAA Section 7 as authorizing nationwide service of process. Because it found no authority under the FAA for nationwide service, the Court of Appeals did not address the issue of whether the FAA authorizes the service of subpoenas for production of documents only.

Attorneys

- Charles A. Gilman
- John J. Schuster