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RECENT TRENDS AND DEVELOPMENTS IN AUTOMOTIVE CLASS ACTIONS

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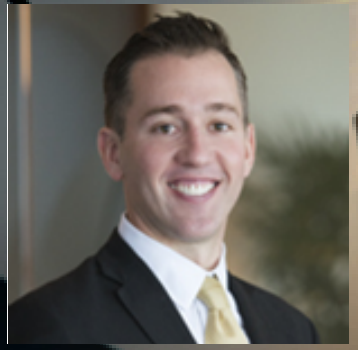
Agenda

- How Auto Defect Claims are Presented in Class Actions
- Personal Jurisdiction
- Does Manifestation of a Defect Matter?
- Key Affirmative Defenses
- Challenging Damages Theories
- Certification Does Mean Settlement

Presenters

Lisa Weddle
Partner, Los Angeles



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Product Defect Claims Under Disguise

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Not Products Liability, But Based on Product Defect

- Plaintiffs often cannot pursue products liability claims because they did not experience physical injury to person or property.
- Because products liability law does not authorize no-injury actions, plaintiffs ground their claims in consumer fraud and seek economic damages:
  - automakers wrongfully induced the vehicle purchase by concealing the alleged defect
  - plaintiffs would have paid less for their vehicles or would not have purchased or leased them at all had they known of the alleged defect.
- Product defect claims are not easily certifiable because whether a class member suffered a physical injury to person or property, and, if so, the extent of any such injury, will vary.

Plaintiffs Still Need to Prove a Defect

- Even though plaintiffs pursue consumer fraud-type claims, hold them to their burden of showing that there is a defect.
- Plaintiffs need to plead a design defect that is actionable in the consumer-fraud context. Absent a defect, plaintiffs lack standing and cannot prove their claims.
  - This is particularly challenging for plaintiffs in cases where there has not been a product malfunction or failure, and the product works as intended.
  - Alleging that the defect is a design without a particular "safety" benefit that was never part of the bargain to begin with is not enough.
- Plaintiffs have an evidentiary burden to establish the existence of a design defect.
  - Braverman v. BMW of N. Am., LLC, No. 21-55427, 2023 WL 2445684, at *2 (9th Cir. Mar. 10, 2023) (affirming summary judgment for BMW where plaintiffs offered no evidence, and no expert opinion, as to whether the vehicles with the feature at issue were defective)

Personal Jurisdiction & Multi-Plaintiff Actions

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My How Things Have Changed

1990–2010	• No Supreme Court cases about personal jurisdiction.
Pre-2011	• Personal jurisdiction could be exercised over a defendant so long as the defendant had minimum contacts with the forum state. • Personal jurisdiction would exist over manufacturers if products were sold there.
Today	• General personal jurisdiction only exists if the defendant is "at home" in the forum. Must be incorporated or have principal place of business there. • Specific personal jurisdiction is claim-specific. No aggregating of specific personal jurisdiction across claims of different plaintiffs.

What Does This Mean for Automobile Manufacturers?

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Recent Automobile Personal Jurisdiction Decisions

Ditter v. Subaru Corp., No. 20-CV-02908-PAB-MEH, 2022 WL 889102, at *9 (D. Colo. Mar. 25, 2022)

- **Facts**
  - Personal injury suit arising from allegedly defective airbag that deployed and caused brain injury.
- **Holding**
  - Colorado court did not have personal jurisdiction over Japanese automaker Subaru Corporation.
- **Reasoning**
  - Court refused to impute jurisdictional facts regarding Subaru's American subsidiary, who was also a defendant, to the Japanese parent company.
  - Significant sales of Subaru vehicles in Colorado and the creation of a global, or even nationwide, distribution system is insufficient, standing alone, to demonstrate minimum contacts with Colorado.
  - Subaru Corporation did not sell vehicles to dealers in Colorado and did not conduct sales or marketing campaigns in Colorado—only the American subsidiary did.
  - Subaru Corporation designed and manufactured vehicles outside of Colorado.
  - No alter ego or agency theory because no allegations that the parent exercised control over subsidiary's distribution, marketing, or maintenance efforts in Colorado.
  - The court took a narrower view of personal jurisdiction.

Recent Automobile Personal Jurisdiction Decisions

Lewis v. Mercedes-Benz USA, LLC, 530 F. Supp. 3d 1183 (S.D. Fla. 2021)

- **Facts**
  - Class action seeking economic damages for vehicles with purported latent headrest defect.
- **Holding**
  - Florida court had specific personal jurisdiction over claims brought by the Florida plaintiffs against Daimler (a German company) regarding an allegedly defective neck rest in Mercedes-Benz vehicles.
- **Reasoning**
  - No general personal jurisdiction because Daimler was not "at home" in Florida, but specific jurisdiction over Florida claims.
  - Purposefully availed itself of Florida forum in large part because it allegedly utilized/controlled its subsidiary to conduct business in Florida, including distribution of vehicles to Florida, targeting of Florida consumers through advertising, and selling Florida residents its cars through its US distributor at dealerships in Florida.
  - Claims arose out of sale and marketing of those vehicles in Florida.
  - No compelling constitutional reason not to find specific jurisdiction.
  - Adopts broad view: "A foreign manufacturer that utilizes an American subsidiary to target distribution of its product to the forum state is appropriately subject to those states' jurisdiction."

Recent Automobile Personal Jurisdiction Decisions

In re ZF-TRW Airbag Control Units Prod. Liab. Litig., No. LAML1902905JAKFFMX, 2022 WL 522484 (C.D. Cal. Feb. 9, 2022)

- **Facts**
  - In wide-ranging airbag defect class action — involving 66 plaintiffs and multiple OEMs and component manufacturers — plaintiffs alleged false advertising and RICO claims.
- **Holding**
  - California court did not have personal jurisdiction over Japanese automaker Toyota Motor Corporation.
- **Reasoning**
  - Rejected plaintiffs' alter ego and agency theory bases for jurisdiction, which sought to use jurisdictional facts regarding US-based Toyota Motor Sales and Toyota Motor North America to establish jurisdiction over Toyota Motor Corporation.
  - Allegations that (1) Toyota Motor Corporation had a North American division, (2) regularly submitted applications for EPA certification, and (3) registered and maintained trademarks with the US government – were insufficient to establish minimum contacts.
  - The fact that Toyota Motor Corporation placed its vehicles into the stream of commerce with the expectation that they would enter the United States and the fact that Toyota Motor Sales was the "authorized importer and distributor' of Toyota vehicles" did not establish purposeful availment.

Recent Automobile Personal Jurisdiction Decisions

In re Toyota Hybrid Brake Litig., No. 4:20-CV-127, 2021 WL 2805455 (E.D. Tex. July 6, 2021)

- **Facts**
  - Multiple plaintiffs brought class action alleging a brake defect.
- **Holding**
  - Texas court had personal jurisdiction over Toyota Motor Corporation.
- **Reasoning**
  - Toyota Motor Corporation purposefully availed itself of Texas jurisdiction by designing, manufacturing, assembling, and testing vehicles, moving vehicles to the United States or assembling stateside, and propelling the vehicles downstream for sale across the United States, including Texas, through dealership networks.
  - Interconnected corporate structure of the four defendants—with Toyota Motor Corporation at the head—bases its domestic operations in Texas.
  - Because Toyota Motor Corporation benefits financially from vehicles sold into Texas, it is reasonably foreseeable that Toyota Motor Corporation could be hauled into court in Texas.
  - "TMC could reasonably anticipate that its geographically unlimited product flow would reach, among other states, Texas—one of the largest and most consumer-heavy states in the country."

How Does Personal Jurisdiction Impact Multi-Plaintiff Actions?

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BMS – Personal Jurisdiction over Defendant Must Be Analyzed for Each Plaintiff

- *Bristol-Myers Squibb Co. v. Superior Court of California*, 137 S. Ct. 1773 (2017) (*BMS*) – Mass Action
  - In BMS, the Supreme Court held that the Fourteenth Amendment's due process clause prevented a California state court from exercising specific personal jurisdiction over nonresident plaintiffs' state law claims when those claims had no connection to the forum state. 137 S. Ct. at 1781.
  - Expressly left open "whether the Fifth Amendment imposes the same restrictions on the exercise of personal jurisdiction by a federal court." Id. at 1784.
  - Expressly left open the impact on class actions.

BMS and Multi-Plaintiff Actions

Impact on Multi-Plaintiff Cases

- Need personal jurisdiction over defendant as to claims of each plaintiff.
- Personal jurisdiction cannot be aggregated across plaintiffs.

Impact on Class Certification

- Left open the question of whether multi-plaintiff class actions can be brought in forums where general jurisdiction does not exist over the defendant—that is, where the defendant is not "at home."

Key Arguments

- Class cannot be certified where court lacks personal jurisdiction over the defendant with respect to claims of absent class members.
- Certifying a multi-state class action, where general jurisdiction over the defendant does not exist, would allow Rule 23 to be used to expand the substantive rights of plaintiffs in violation of the Rules Enabling Act.

CLASS ACTIONS – Open Questions

1. *Mussat v. IQVIA, Inc.*, 953 F.3d 441 (7th Cir. 2020) — *BMS* does not apply to class actions under federal statute.

2. *Lyngaas v. Curaden AG*, 992 F.3d 412 (6th Cir. 2021) – Personal jurisdiction over named plaintiff is sufficient.

3. *Cruson v. Jackson Nat'l Life Ins. Co.*, 954 F.3d 240 (5th Cir. 2020) – Arguments regarding personal jurisdiction of absent class members not waived when raised for the first time in an opposition to class certification.

4. *Molock v. Whole Foods Mkt. Grp., Inc.*, 952 F.3d 293 (DC Cir. 2020) – Motion to dismiss absent class members for lack of personal jurisdiction was premature.

5. *Moser v. Benefytt, Inc.*, 8 F.4th 872, 879 (9th Cir. 2021) – Vacating nationwide class and remanding to determine personal jurisdiction under *BMS*, where district court improperly found defendant had waived *BMS* argument by not raising it in Rule 12(b) motion.

Does Manifestation of a Defect Matter?

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Key Issue: The Manifest Defect Rule

- **To show class-wide causation and/or injury in a vehicle defect lawsuit, must each class member actually experience the alleged problem?**
  - Example: Sunroof that doesn't open all the time (non-safety).
  - Example: Brakes that don't work all the time (safety).
- **Hinges upon state law, standing rules, forum, and nature of claim.**
- **Some legal claims expressly require manifestation as an element.**
  - Example: California breach of warranty: plaintiffs "must provide substantial evidence of a defect that is substantially certain to result in malfunction during the useful life of the product." *Am. Honda Motor Co. v. Superior Court*, 132 Cal. Rptr. 3d 91, 98 (Ct. App. 2011) (emphasis added).
  - Other claims do not, but all claims and/or Article III standing require an actual "injury" or "harm".
  - Need to evaluate how the elements of claims/standing law have been interpreted in the forum.

Examples of Approaches

- **Ninth Circuit: *Wolin/Nguyen Decisions***
  - *Wolin v. Jaguar Land Rover N. Am.*, LLC, 617 F.3d 1168, 1173 (9th Cir. 2010) ("manifestation of a defect is not a prerequisite to class certification").
  - *Nguyen v. Nissan N. Am., Inc.*, 932 F.3d 811, 822 (9th Cir. 2019) (distinguishing between "where a defect causes an injury," and "where the defect itself is the injury").
  - **Harm occurs at the point of sale. Defect with the product need not manifest if plaintiff pursues a price premium or overpayment theory.**
    - Very easy for Plaintiff to plead: "I would have paid less or would not have bought the product if I'd known of the defect."
    - Akin to a fraud on the market theory.
- Other Circuits have taken similar views: *In re Whirlpool Corp. Front-Loading Washer Prod. Liab. Litig.*, 722 F.3d 838, 857 (6th Cir. 2013).

Examples of Approaches

- **Eighth Circuit: Different Approach.**
  - "In this circuit, plaintiffs claiming economic injury do not have Article III standing in product defect cases unless they show a manifest defect. Some class members cannot. Because the class has not been 'defined in such a way that anyone within it would have standing,' the class cannot be certified."
  - *Johannessohn v. Polaris Indus. Inc.*, 9 F.4th 981, 988 (8th Cir. 2021) (affirming denial of class certification).
- **Seventh Circuit: Something in Between?**
  - *Pella Corp. v. Saltzman*, 606 F.3d 391, 395 (7th Cir. 2010).
  - Court certified two classes:
    - Rule 23(b)(2) injunctive relief class for members whose defect had not yet manifested.
    - Limited Rule 23(b)(3) damages class (on certain issues) for those whose defect had manifested.

What Does This Mean?

- Circuit Split: Whether a class can be certified in an action for economic injury about a product defect will hinge upon the nature of the claim and where the case is brought.
- Need to look at both state law, Article III principles, and type of problem at issue.
- Irony: Let's certify the class because defendants should want class certification?
  - "If Whirlpool can prove that most class members have not experienced a mold problem and that it adequately warned consumers of any propensity for mold growth in the Duets, then **Whirlpool should welcome class certification**. By proving that the Duets are not defectively designed and that no warnings were needed (or if they were, that adequate warnings were issued to consumers), Whirlpool can obtain a judgment binding all class members who do not opt out of the class."
  - *In re Whirlpool Corp. Front-Loading Washer Prod. Liab. Litig.*, 722 F.3d 838, 857 (6th Cir. 2013).
- Even if a class is certified, continue to press this key defense.
  - Common sense defense: How can a plaintiff prove her claims on a class-wide basis if most customers got complete satisfaction from their vehicles?

Key Affirmative Defenses

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Affirmative Defenses – They Matter

- Statute of Limitations
  - Too late; no tolling.
- Arbitration
  - Can’t bring class action; must arbitrate.
- Voluntary Payment Doctrine
  - Paid with full knowledge of any issue.
- Mitigation of Damages
  - Never took steps to prevent/mitigate any loss.

Statute of Limitations – Sword

- Dismissal of Lawsuit
  - *Bettles v. Toyota Motor Corp.*, 2022 WL 17627745, at *5 (C.D. Cal. Dec. 13, 2022); *Heuer v. Nissan N. Am., Inc.*, 2017 WL 3475063, at *3 (S.D. Fla. Aug. 11, 2017).
- Summary Judgment
  - *Xu v. Porsche Cars N. Am., Inc.*, No. 1:20-CV-0510-SEG, 2023 WL 1790068, at *17 (N.D. Ga. Jan. 17, 2023) ("All of Xu's claims fail without equitable tolling of the relevant statutes of limitations"; denying certification because no adequate class representative).
- Oppose Class Certification
  - *Martel v. Writers Guild of Am.*, 2021 WL 6618617, at *4 (C.D. Cal. Dec. 7, 2021) (individualized analysis necessary to resolve SOL issues and fraudulent concealment tolling).
- Narrow Certified Class
  - *Cardenas v. Toyota Motor Sales, U.S.A., Inc.*, No. 18-cv-22798 (S.D. Fla. Dec. 7, 2022); *Minter v. Wells Fargo Bank, N.A.*, 279 F.R.D. 320, 327–28 (D. Md. 2012).
- Prevail at Class Trial
  - *Cardenas v. Toyota Motor Sales, U.S.A., Inc.*, No. 1:18-cv-22798-FAM (S.D. Fla.) (March 10, 2023).

Challenging Damages Theories

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Class-Wide Damages Theories: The Battle

- Plaintiffs must show injury for all class members.
- Often leads to absurd results in vehicle class actions, but only when the models are run.
- Claim-specific – what is the proper measure of damages?
  - Ex: California consumer protection claims: Plaintiff can recover broad types of pecuniary damage, including "the difference between the actual value of that with which the defrauded person parted and the actual value of that which he received, together with any additional damage arising from the particular transaction." *Nguyen v. Nissan N. Am., Inc.*, 932 F.3d 811, 818 (9th Cir. 2019).
  - Ex: Florida breach of warranty: "[D]ifference at the time and place of acceptance between the value of the goods accepted and the value they would have had if they had been as warranted, unless special circumstances show proximate damages of a different amount." Fla. Stat. § 672.714(2); *see also* Cal. Com. Code § 2714(2).
- Big fight: Can you consider what happens after the vehicle is purchased?
  - Ex: *Victorino v. FCA US LLC*, 2022 WL 3691642, at *3 (S.D. Cal. Aug. 25, 2022) ("under the benefit of the bargain theory, the court should not consider any post-sale conduct as it is immaterial. In this case, the benefit-of-the-bargain damages should be measured at the time of sale.").
  - Ex: *Licul v. Volkswagen Grp. of Am., Inc.,* 2013 WL 6328734, at *5 (S.D. Fla. Dec. 5, 2013) (no FDUTPA claim because "Marles purchased the Jetta at a price that did not take account of the defect, and she sold the Jetta at a price that did not take account of the defect").

Popular Class-Wide Damages Theories

Conjoint Analysis to Show Overpayment at Time of Purchase

Average Cost of Repair or Replacement

Depreciation of Vehicle Value

Conjoint Analysis

What Is It?

- Use consumer survey to try to show the market value of vehicle with and without the alleged defect.
- Survey is done on computer; it presents respondents with choices between multiple vehicles, with multiple features, at varying price points.
- One of the features is a vehicle with and without the alleged defect.
- Respondents are asked what vehicles, at what prices and with what features, they prefer.
- Results are then run through "market simulator" to determine value of each feature.
- Use this to determine difference in market value between a product with and without a feature, and therefore to calculate "overpayment".

Why Is It Popular?

- Easy to do.
- Looks fancy.
- Recycle plaintiffs' experts.
- Companies use conjoint analyses to try to predict consumer demand (but not market value).

Conjoint Analysis – Just for Now or Here to Stay?

- Split among courts about validity.
- Most district courts accept it without much analysis.
  - *Johnson v. Nissan N. Am., Inc.*, 2022 WL 2869528, at *9 (N.D. Cal. July 21, 2022); *Sanchez-Knutson v. Ford Motor Co.,* 310 F.R.D. 529 (S.D. Fla. 2015); *Hadley v. Kellogg Sales Co.,* 324 F. Supp. 3d 1084 (N.D. Cal. 2018).
- Some recent cases have rejected it due to absurd results in vehicle cases.
  - *In re Volkswagen "Clean Diesel" Mktg., Sales Pracs., & Prod. Liab. Litig.*, 500 F. Supp. 3d 940 (N.D. Cal. 2020), *aff'd sub nom. Schell v. Volkswagen AG*, No. 20-17480, 2022 WL 187841 (9th Cir. Jan. 20, 2022); *In re Gen. Motors LLC Ignition Switch Litig.* 427 F. Supp. 3d 374, 385 (S.D.N.Y. 2019).
- Recent Fifth Circuit decision rejected as implausible the use of conjoint survey to show injury.
  - *Earl v. Boeing Co.*, 53 F.4th 897, 903 (5th Cir. 2022) (reversing certified class of purchasers of tickets on defective airplane because plaintiffs suffered no cognizable injury, notwithstanding conjoint study).
- Results often defy common sense.
  - Absurd results – Ex.: 25% of a vehicle's value is the potential for some minor issue to occur.
  - Not how consumers make actual decisions about cars.
  - No analysis of supply considerations — pure demand.
  - Often ignores actual marketplace.

Average Cost of Repair – for Everyone, Really?

- Claim-specific
  - Recognized for California consumer protection and warranty claims. *See, e.g., Nguyen v. Nissan N. Am., Inc.*, 932 F.3d 811, 821 (9th Cir. 2019) ("average cost of repair" is proper damages model for claims under CLRA and for breach of warranty under California law).
  - Not recognized for Florida consumer protection claim. *See, e.g.*, *Ohio State Troopers Ass'n, Inc. v. Point Blank Enterprises, Inc.*, 481 F. Supp. 3d 1258, 1284 (S.D. Fla. 2020), *aff'd*, 2021 WL 4427772 (11th Cir. Sept. 27, 2021) ("it is well-accepted that FDUTPA does not cover repair costs").
- Key questions
  - Is it viable as a matter of law?
  - Why is it needed for class members who experience no issue with their vehicle?
- Often paired with other damages models
- Practical implications
  - Intutive appeal, but does everyone really need a repair or replacement?
  - May be most reasonable damages model.
  - Successful attack may leave only absurd damages models.

Depreciation in Value

- Market value depreciates over time due to alleged vehicle problem.
- Usually requires a product recall or notice about the problem to measure impact.
  - Applies to consumers who own vehicles at time of recall or notice.
- Often not appropriate to show point-of-sale harm.
  - *In re Volkswagen "Clean Diesel" Mktg., Sales Pracs., & Prod. Liab. Litig.*, 500 F. Supp. 3d 940, 951 (N.D. Cal. 2020), *aff'd sub nom. Schell v. Volkswagen AG*, No. 20-17480, 2022 WL 187841 (9th Cir. Jan. 20, 2022) (rejecting model because it "principally relies on the effects of disclosure, including brand effects, even though Plaintiffs resold their cars before disclosure. . . . .Customers still in possession of their fraudulent vehicles at the time of disclosure were harmed by that reaction. Plaintiffs were not.").
- Can be used as a sword.
  - Expert testimony about resale market may help show that vehicle did not lose market value.
  - Ex.: Vehicle with non-safety defect that suffers no decline in resale value years later.

Plaintiffs' Mantra: Post-Judgment Claims Administration

- Don't worry about individual injury or even damages determinations. Why? It's just a matter of claims administration.
  - *Bledsoe v. FCA US LLC*, 2022 WL 4596156, at *34 (E.D. Mich. Sept. 30, 2022) ("Stockton has provided admissible measurements of class-wide damages. And in class actions, courts permit damages to be allocated after class certification").
- Problems
  - Vague and ambiguous concept premised upon settlement principles.
  - Seventh Amendment problems.
  - Due process right to challenge facts to support monetary allocations.
  - Can't "administer" away a company's defenses.

Certification Does Not Mean Settlement

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Certification Does Not Mean Settlement

- Many avenues available even if class certification is granted.
  - Trial plan explaining manageability issues.
  - Narrowing the class prior to trial.
  - Class trial strategy.
  - Decertification right before or during trial.
- Recent examples:
  - GM class trial (N.D. Cal. October 2022) (jury awards $2,700 to each of the 38,000 class members in California, Idaho and North Carolina; allegedly defective piston rings that caused excessive oil consumption and engine breakdowns);
  - FCA class trial (E.D. Mich. September 2022) (issues trial; jury found defect under Utah law, but not 18 other laws, and that FCA did not conceal the alleged monostable shifter defect).
  - Toyota class trial (S.D. Fla. March 2023) (class narrowed; jury finds for manufacturer on class claims under Florida law; alleged defect in HVAC system).

Questions?

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Biography

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Lisa R. Weddle guides healthcare, automotive, technology, and financial services companies through every phase of class action and complex commercial litigation and arbitration across the United States. She regularly defends clients against claims of unfair business practices (including under California's Unfair Competition Law and Consumers Legal Remedies Act), consumer fraud, consumer protection, false advertising, and breach of warranties. Lisa has more than a decade of experience litigating issues affecting the managed care industry, representing leading health plans, insurers, and other entities in complex, high-stakes healthcare and ERISA welfare benefit plan matters. Lisa is the hiring partner for the Los Angeles office.

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Brian is a partner in our Miami office, and is a co-chair of Morgan Lewis' firm-wide class action working group. Brian regularly defends automobile and other companies against high-stakes class actions involving product liability, consumer protection, breach of warranty, fraud, and other claims in courts across the country, based upon product defect and false marketing theories. Brian serves as national counsel for several companies in product defect and false marketing litigation across the country. Brian has extensive experience handling MDL proceedings, class certification hearings, class action trials, and appeals.

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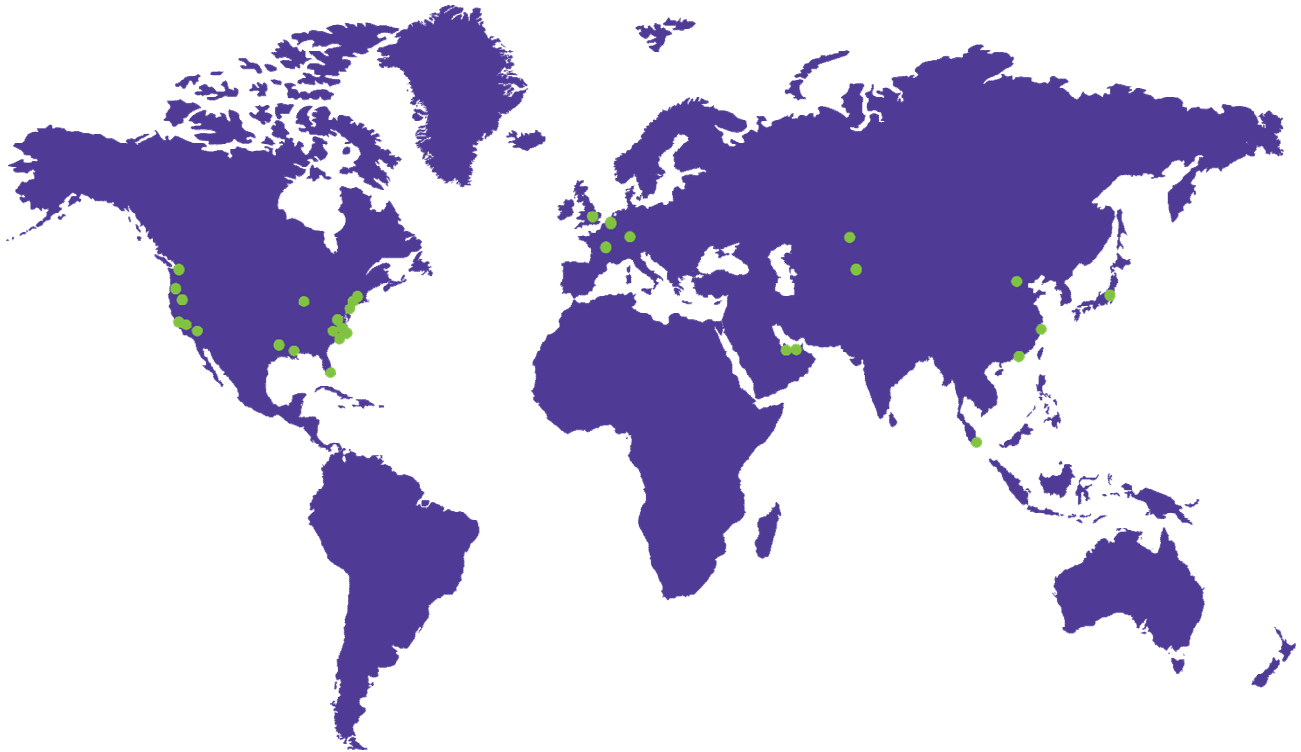

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