BEFORE THE UNITED STATES
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

IN RE: ZF-TRW ACU DEFECT LITIGATION	**MDL Docket No. 2905**

THE *HERNANDEZ* PLAINTIFFS' RESPONSE IN SUPPORT OF MOTION TO TRANSFER ACTIONS PURSUANT TO 28 U.S.C. § 1407

In accordance with Rule 6.1(c), Plaintiffs Michael Hernandez and Tammy Tyler in *Hernandez, et al. v. Hyundai Motor America, Inc.*, Case No. 8:19-cv-00782 (C.D. Cal. Apr. 29, 2019), hereby submit this response to the Motion for Centralization Of Related Actions in the Central District Of California, Or in the Alternative, the Eastern District Of Michigan, Pursuant to 28 U.S.C. § 1407 (the "Motion") filed by the *Altier* Plaintiffs[1] and the *Samouris* Plaintiffs[2]. Dkt. 1.

The *Hernandez* Plaintiffs support centralization in the Central District of California. Consolidation and coordination is proper because the underlying actions share common factual allegations and bring overlapping claims arising out of a serious, safety-related airbag defect, and would otherwise require duplicative discovery and pretrial proceedings in district courts in at least five different states.

While Defendant ZF TRW is based in Michigan, the Central District of California is the best transferee selection because, among other reasons, it is home to a majority of the Defendants, and thus the decision-making of these Defendants regarding the dangerous airbag deployment system occurred in and emanated from the Central District of California. Moreover, Hyundai and Kia — both based in the Los Angeles area — acted as ringleaders in this fraud:

[1] Plaintiffs Mark D. Altier, William Baerresen, Eric Fishon, Dragan Jagnjic, Cynthia Sacchett, Jacqueline Santos-Silva, and Amanda Swanson.
[2] Plaintiffs Gary E. Samouris and Nida Edith Samson.

those two automakers controlled and directed the investigations into each of the crashes caused by ACU failures in Hyundai and Kia vehicles, and determined when, if at all, to involve ZF TRW in the post-crash analyses.[3] Further, Hyundai and Kia (not ZF TRW) made the final decisions regarding how the official results of these investigations would be reported to the public and NHTSA. Plaintiffs have also alleged that Hyundai and Kia were members of a RICO conspiracy where they, among other things, concealed the nature of the defect and delayed their decision to initiate a recall, all from their offices in the Central District of California.

Finally, the Central District of California is also the current forum for at least eight of the fifteen underlying actions. The Honorable John A. Kronstadt is the judge with the lowest-docketed action, and in light of his experience and credentials, would be an excellent choice for transferee judge.

I. FACTUAL BACKGROUND

The National Highway Traffic Safety Administration ("NHTSA") estimates some 12.5 million vehicles may contain a defective Airbag Control Unit ("ACU") designed and manufactured by ZF TRW Automotive Holdings Corporation ("ZF TRW") and supplied to numerous vehicle manufacturers, including Hyundai, Kia, Mitsubishi, Toyota, Honda and Fiat Chrysler US (collectively, the "Automobile Manufacturers"). The ACU dictates if and when airbags and seatbelt pretensioners are engaged. Airbag and seatbelt failures often lead to catastrophic injury or death, so a defective Airbag Control Unit poses a serious danger to all drivers and passengers in affected vehicles every time they take the car on the road.

A crucial component of the ACU is the application-specific integrated circuit ("ASIC"). When the ASIC is functioning properly, the ACU will detect the severity of a crash, deploy the

[3] *Hernandez, et al v. Hyundai Motor America, Inc.*, et al., 8:19-cv-00782 at ¶¶ 29-38.

airbags if necessary, and engage the seatbelt pretensioners. Plaintiffs allege that the ACU is defective because it is susceptible to electric overstress ("EOS") – it allows excess electrical signals produced during a crash to overload the ASIC and prevent the deployment of the airbag and the seat belt pretensioners.

In 2016, Fiat Chrysler initiated a recall of over 1.4 million vehicles for this defect. After NHTSA began investigating other car manufacturers for similar non-deployments, it was revealed that Kia and Hyundai vehicles, model years 2011 through 2013, were plagued by this same defect. In fact, from 2011 through 2015, Hyundai, Kia and ZF TRW investigated dangerous airbag non-deployments in several Kia and Hyundai vehicles, but failed to inform NHTSA of the issue until the end of 2015.

It was not until February of 2018 that Hyundai initiated a recall of 150,000 vehicles that have the alleged defect. In October of 2018, Hyundai increased the number of vehicles recalled to 581,000. In August of 2018, Kia also initiated a recall for 507,000 vehicles for the same defect. To date, Honda and Toyota have not initiated any ACU Defect recalls.

As of the date of this Response, fifteen class action lawsuits have been filed by purchasers and lessees against automakers and ZF TRW in five Districts (the "Related Actions"). Each of the Related Actions asserts similar claims for violations of federal law, state consumer protection statutes, and related common law causes of action. The Related Actions all seek damages and related equitable relief.

II. ARGUMENT

The purpose of multidistrict litigation is "to 'promote the just and efficient conduct' of 'civil actions involving one or more common questions of fact' that are pending in different districts." *In re Phenylpropanolamine Products Liability Litigation*, 460 F.3d 1217, 1229 (9th

Cir. 2006) (quoting 28 U.S.C. § 1407(a)). Transfer and consolidation to the Central District of California best meets this objective.

A. Centralization of the Related Actions is Appropriate under 28 U.S.C. §1407.

Section 1407(a) permits transfer and consolidation or coordination of cases where: (1) the civil actions involve "one or more common questions of fact," (2) transfer and consolidation or coordination will further "the convenience of the parties and witnesses" and (3) transfer and consolidation or coordination "will promote the just and efficient conduct of [the] actions." Each of these factors is met here.

1. The Related Actions Involve Common Questions of Fact.

"Section 1407 does not require a complete identity or even a majority of common factual or legal issues as a prerequisite to transfer." *In re Darvocet, Darvon & Propoxyphene Prod. Liab. Litig.*, 939 F. Supp. 2d 1376, 1377 (J.P.M.L. 2013); *accord In re Denture Cream Prod. Liab. Litig.*, 624 F. Supp. 2d 1379, 1381 (J.P,M.L. 2009). Instead, the statute contemplates that transfer of related cases involving some individualized issues often serves "the salutary effect of placing all actions . . . before a single judge who can formulate a pretrial program that: (1) allows discovery with respect to any non–common issues to proceed concurrently with discovery on common issues, and (2) ensures that pretrial proceedings will be conducted in a manner leading to the just and expeditious resolution of all actions to the overall benefit of the parties." *In re: Gadolinium Contrast Dyes Prod. Liab. Litig.*, 536 F. Supp. 2d 1380, 1382 (J.P.M.L. 2008) (citing *In re Smith Patent Litigation,* 407 F.Supp. 1403, 1404 (J.P.M.L. 1976)).

The Related Cases here implicate sufficiently common issues to justify transfer under Section 1407. Each Related Action alleges that a common component (the ACU) was "designed and manufactured by" one Defendant (ZF TRW) and is defective because the ASIC becomes

over stressed by excess electrical energy generated during an automobile crash. *See, e.g.*, *Hernandez v. Hyundai Motor America, Inc.*, No. 19-cv-782, Dkt 1 at ¶¶ 22–24 (C.D. Cal. April 4, 2019). This causes a failure in the ACU and neither the airbags nor the seat belt pretensioners will deploy. As such, each of the Related Actions involves common questions of fact, such as:

1. Whether the ACU manufactured and designed by ZF TRW contains a defect that makes the ASIC susceptible to electrical overstress;
2. Whether ZF TRW and the Automobile Manufacturers had a duty to disclose information they knew about the alleged design defect that made the ZF TRW ACUs dangerous;
3. Whether and when ZF TRW and the Automobile Manufacturers knew about the alleged design defect; and
4. Whether ZF TRW and the Automobile Manufactures failed to disclose the existence of the defect.

Where, as here, related cases are based on common allegations concerning automobiles with the same defective component part manufactured by one supplier defendant (ZF TRW), transfer under Section 1407 is appropriate, even when the cases implicate different makes and models of vehicles. For example, the Panel in *In re Takata Airbag Products Liability Litigation* held that transfer under Section 1407 was appropriate where related actions "share[d] factual questions arising from allegations that certain Takata-manufactured airbags are defective in that they can violently explode and eject metal debris, resulting in injury or even death," even though they involved many different makes and models of vehicles manufactured by Honda, BMW, Ford, Nissan, Subaru, and Toyota. 84 F. Supp. 3d 1371, 1372 (J.P.M.L. 2015). The *Takata* MDL has been very successful; to date, the automaker defendants have agreed to pay more than

$1.5 billion to resolve the claims against them. The successful *Takata* MDL should be followed here, as the fact pattern here is closely analogous.

Takata is consistent with many other transfer orders centralizing closely related actions against competing defendants based on common core issues, even when there is not one common defendant. *See In re: Checking Account Overdraft Litig.*, 626 F. Supp. 2d 1333, 1335 (J.P.M.L. 2009) (rejecting argument that centralization was inappropriate "in actions brought against different bank defendants" because "[a]ll actions share factual questions relating to the imposition of overdraft fees by various bank defendants"); *In re: Incretin Mimetics Prod. Liab. Litig.*, 968 F. Supp. 2d 1345, 1347 (J.P.M.L. 2013) (centralizing cases against competitors Merck, Amylin and Eli Lilly where the cases involved "highly similar allegations about each of the four drugs that manage blood insulin levels and the propensity of those drugs to cause pancreatic cancer"); *In re 100% Grated Parmesan Cheese Mktg. & Sales Practices Litig.*, 201 F. Supp. 3d 1375, 1378 (J.P.M.L. 2016) (centralizing cases against competing cheese manufacturers based on common practice of labelling cheese containing cellulose as "100%' grated parmesan" because there was "significant overlap in the central factual issues, parties, and claims"); *In re Daily Fantasy Sports Mktg. & Sales Practices Litig.*, 158 F. Supp. 3d 1375, 1377, 1379 (J.P.M.L. 2016) (centralizing cases against competing fantasy sports companies where cases required similar "discovery regarding the nature of . . . Defendants' online daily fantasy sports contests, their advertising and promotions, and their internal policies and practices").

More generally, the Panel has consistently centralized actions arising out of defective vehicle components in different vehicle models. *See In re Gen. Motors Corp. Dex-Cool Prod. Liab. Litig.*, 293 F. Supp. 2d 1381, 1382 (J.P.M.L. 2003) (transfer appropriate where cases were

all based on "the Dex–Cool engine coolant" "in various Pontiac, Buick, GMC, Oldsmobile, Chevrolet and Cadillac cars, trucks, minivans and sport utility vehicles"); *In re: Michelin N. Am., Inc., PAX Sys. Mktg. & Sales Practices Litig.*, 536 F. Supp. 2d 1365, 1366 (J.P.M.L. 2008) (transfer appropriate where cases were all based on PAX system "manufactured by Michelin and pre-installed on certain Honda and Acura brand automobiles"); *In re Gen. Motors Corp. Air Conditioning Mktg. & Sales Practices Litig.*, 289 F. Supp. 3d 1340, 1341 (J.P.M.L. 2018) (transfer appropriate where cases all concerned "the design, manufacture and performance of the air conditioners in several models of GM vehicles, spanning model years from 2014–2017"); *In re Bridgestone/Firestone, Inc., Tires Prod. Liab. Litig.*, 151 F. Supp. 2d 1381, 1382 (J.P.M.L. 2001) (transfer of case against tire manufacturer and Ford appropriate where cases all concerned "whether Firestone tires are defective, whether Firestone had knowledge of the alleged defects, and whether the August 2000 tire recall as subsequently modified adequately addresses the problems with the defective tires"). These decisions also support centralization here.

In opposing transfer based on a purported lack of commonality, Defendant FCA ignores the facts of the Related Actions here and these directly applicable authorities involving defective automobile parts. *See* Dkt 23, at 8-12. But the decisions cited by FCA as purported support for denying transfer here are inapposite. Unlike the Related Actions here, the related actions in the decisions cited by FCA did not involve a core defective component part manufactured and designed by a common defendant. Instead, they either did not involve defective products at all or they involved different defective products or components made by different manufacturers. *See, e.g., In re Ambulatory Pain Pump-Chondrolysis Prod. Liab. Litig.*, 709 F. Supp. 2d 1375, 1377 (J.P.M.L. 2010) (cases involved an "indeterminate number of different pain pumps made by different manufacturers" and "different anesthetics made by different pharmaceutical

companies"); *In re: Table Saw Prods. Liab. Litig.*, 641 F. Supp. 2d 1384, 1384 (J.P.M.L. 2009) (cases involved "[m]ultiple different saws made by multiple different manufacturers"); *In re Amino Acid Lysine Antitrust Litig.*, 910 F. Supp. 696, 701 (J.P.M.L. 1995) (cases involved "different products, with different uses, produced for the most part by different manufacturers"); *In re: Yellow Brass Plumbing Component Prod. Liab. Litig.*, 844 F. Supp. 2d 1377, 1378–79 (J.P.M.L. 2012) (cases were based on "components . . . made by at least three manufacturers").

Accordingly, the requirement that the Related Actions present one or more common questions of fact is easily met.

2. Centralization Will Be More Convenient for the Parties and Witnesses.

Centralization of the Related Actions will indisputably serve the convenience of the parties and witnesses by alleviating the burden of having to prosecute and defend competing and overlapping class actions in multiple federal districts across the country.

As mentioned above, there are currently fifteen Related Actions pending (including the *Hernandez* Plaintiffs' case), and there almost certainly will be many more. Without centralization, the parties would be subject to inconsistent court orders relating to pretrial proceedings. In addition, the parties would be subject to duplicative discovery requests, and key witnesses could be subject to multiple depositions. For example, each Related Action will require discovery related to:

1. Defendants' design, manufacture, and testing of the ACUs and its components;
2. Internal investigations and testing conducted by Defendants relating to the defective ACU or its components;
3. Defendants' communications with each other and NHTSA with respect to the defective ACU; and

4. Actions or steps taken by Defendants to address safety concerns related to the ACUs.

Centralization of the Related Actions will limit this complex discovery to a single proceeding before a single transferee court, thus easing the burden on the parties and witnesses. This strongly supports centralization. *See In re Pilot Flying J Fuel Rebate Contract Litigation (No. II)*, 11 F. Supp. 3d 1351, 1352 (J.P.M.L. 2014).

3. Centralization Will Promote the Just and Efficient Conduct of the Related Actions.

The Panel has long recognized that centralization promotes the just and efficient conduct of the litigation when, like here, there are numerous lawsuits pending against multiple defendants. *See, e.g.*, *In re Darvocet, Darvon & Propoxyphene Prods. Liab. Litig.*, 780 F. Supp. 2d 1379, 1382 (J.P.M.L. 2011) (consolidating seventeen actions against at least twelve defendants in one district); *In re Chinese-Manufactured Drywall Prods. Liab. Litig.*, 626 F. Supp. 2d 1346, 1347 (J.P.M.L. 2009) (consolidating ten actions against numerous defendants in one district); *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litig.*, 398 F. Supp. 2d 1356, 1358 (J.P.M.L. 2005) (consolidating proceedings in fourteen actions and twenty-one potential tag-along actions). Indeed, the Panel has determined that the risk of inconsistent pre-trial rulings is particularly high due to the presence of the current and potential number of competing and overlapping putative nationwide classes. *See In re Plumbing Fixture Cases*, 298 F. Supp. at 493 ("It is in the field of class action determinations in related multidistrict civil actions that the potential for conflicting, disorderly, chaotic judicial action is the greatest"); *see also In re CertainTeed Corp. Roofing Shingle Products Liability Litigation*, 474 F. Supp. 2d 1357, 1358 (J.P.M.L. 2007) (centralizing actions that involved "overlapping putative class actions.")

Here, too, centralization will eliminate the possibility of conflicting pre-trial rulings among the Related Actions and the many tag-alongs likely to follow. Ordering transfer and consolidation at this early stage will allow these complex cases to proceed in an efficient and coordinated manner. Efficiency is especially important here, where there are serious safety concerns that require prompt attention.

B. The Central District of California Is the Most Appropriate Forum.

In selecting the transferee district, the Panel may consider "where the largest number of cases is pending, where discovery has occurred, where cases have progressed furthest, the site of the occurrence of common facts, where the cost and inconvenience will be minimized, and the experience, skill, and caseloads of available judges." *Manual for Complex Litigation (Fourth)* § 20.1 (2005). Applying these factors, transfer to the Central District of California will best serve the convenient, just, and efficient resolution of these actions.

Number of Cases. The first factor—"where the largest number of cases is pending"—weighs heavily in favor of centralization in the Central District of California. There are currently fifteen pending actions concerning the ACU Defect in the following Districts: Central District of California (8 actions),[4] Eastern District of Michigan (3), Southern District of Florida (2), Eastern District of New York (1), and Western District of Washington (1). This first factor thus favors centralization in the Central District of California, which has half the pending cases.

Status of Related Actions. The second and third factors, which concern the status of discovery and progression of the cases, is effectively neutral. All of the cases are recently filed

[4] Three additional cases have been filed since the *Altier* and *Samouris* Plaintiffs' Motion was filed: *James Carroll et al v. American Honda Motor Company, Inc. et al*, 8:2019-cv-01155, C.D. Cal. June 10, 2019; *Carolyn McFadden v. Hyundai Motor America, Inc. et al.*, 8:2019-cv-01154 C.D. Cal. June 10, 2019; *Jennifer Johnson v. Hyundai Motor America, Inc., et al.*, 8:19-cv-01292, C.D. Cal. June 27, 2019.

and none appear to have commenced discovery. Accordingly, all the actions pending in federal court are essentially identical in all procedural respects.

Where the Common Facts Occurred. The fourth factor concerns "the site of the occurrence of common facts." Here, the site where most of the common facts and unlawful conduct occurred is Southern California. While ZF TRW and FCA US LLC maintain their principal places of business in Livonia, Michigan and Auburn Hills, Michigan, respectively, a majority of the domestic Automobile Defendants named in the Related Actions maintain their principal place of business in Southern California:

- Hyundai Motor America, Inc. maintains its principal place of business in Fountain Valley, California;
- Kia Motor America, Inc. maintains its principal place of business in Irvine, California;
- American Honda Motor Co., Inc. maintains its principal place of business in Torrance, California;
- Mitsubishi Motors North America, Inc. maintains its principal place of business in Cypress, California; and
- Toyota Motor North America, Inc. is a California corporation that maintained its principal place of business in Torrance, California throughout most of the alleged Class Period.[5]

Plaintiffs allege that ZF TRW and the Automobile Manufacturers' unlawful conduct occurred nationwide and affected consumers throughout the United States. However, the decision-making

[5] Toyota Motor North America, Inc. moved its principal place of business in Plano, Texas in or around 2017.

occurred in and emanated from the Central District of California. For example, Hyundai and Kia — both based in the Los Angeles area — acted as ringleaders in this fraud: those two automakers controlled and directed the investigations into each of the crashes caused by ACU failures in Hyundai and Kia vehicles, and determined when, if at all, to involve ZF TRW in the post-crash analyses.[6] Further, Hyundai and Kia made the final decisions as to how the official results of these investigations would be reported to the public and NHTSA.[7] As such, all aspects of the defect investigations, and the decision-making behind what was communicated to NHTSA and the public, occurred from the offices of the Automobile Manufacturers primarily located in the Greater Los Angeles and Orange County areas. Thus, arguably more than any other District, the Central District of California is the site of the occurrence of facts common to all the Related Actions.

Cost and Inconvenience. With respect to "cost and inconvenience," both would be minimized by centralizing the actions in Los Angeles. The majority of Automotive Defendants' likely witnesses and relevant documents are located in California, and the Central District of California is easily accessible from almost anywhere in the country. *See In re Ins. Brokerage Antitrust Litig.*, 360 F. Supp. 2d 1371, 1373 (J.P.M.L. 2005) (selecting the District of New Jersey as the transferee court on grounds that "the district offers an accessible metropolitan location that is geographically convenient for many of th[e] docket's litigants and counsel.") There are five major airports in the surrounding area, including Los Angeles International Airport, Ontario International Airport, John Wayne International Airport, Hollywood Burbank Airport, and Long Bach Airport. Thus, for the witnesses that are not located in or near the District, it is nonetheless

[6] *Hernandez, et al v. Hyundai Motor America, Inc.*, et al., 8:19-cv-00782 at ¶¶ 29-38.
[7] *Id.*

easily accessible from countless domestic and international locations. Thus, centralizing the ACU Defect Litigation in the Central District of California will limit the cost and inconvenience for the parties, witnesses, and counsel.

Residence of Affected Consumers. Given California's car culture and population, it likely has more affected customers than any other state. In 2017, California had the highest number of vehicles in the United States with over 14.8 million cars registered – almost twice the number of cars registered in the next highest state.[8] As such, a verdict or settlement in favor of plaintiffs in the Related Actions will likely have a proportionately greater economic impact in California. This weighs in favor of centralizing the action in California. *See In re Oil Spill By The Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010*, 731 F. Supp. 2d 1352, 1355 (J.P.M.L. 2010) (examining geography and economic impact of the wrongful conduct, and centralizing cases in district closest to the "geographic and psychological 'center of gravity' in the docket").

Judicial Skill and Resources. The last factor—"the experience, skill, and caseloads of available judges"—also weighs in favor of the Central District of California. When transferring a case pursuant to Section 1407, the Panel considers whether the transferee judge has "the ability and temperament to manage . . . large and growing litigation in an efficient and expeditious manner." *In re Diet Drugs Prod. Liab. Litig.*, 990 F. Supp. 834, 836 (J.P.M.L. 1998). The Central District of California has the ability to handle this matter due to the judicial expertise, resources, and limited number of MDLs currently assigned to the district. Each of the District Judges assigned to the class cases pending in the Central District of California has unimpeachable

[8] *U.S. Automobile Registrations in 2017, by State*, Statesia, https://www.statista.com/statistics/196010/total-number-of-registered-automobiles-in-the-us-by-state/ (last visited June 10, 2019.)

credentials and the ability to oversee complex multidistrict litigation. In addition, there are only seven MDLs currently within the Central District of California.[9] Therefore, the Central District of California has the ability to handle the ACU Defect Litigation in an efficient and expeditious manner.

As the *Altier* and *Samouris* Plaintiffs suggested in their Motion, the *Hernandez* Plaintiffs agree that the Honorable John A. Kronstadt, currently presiding over the lowest-docketed action in the ACU Defect litigation, is highly qualified and well-suited to preside over the consolidated actions. Judge Kronstadt is a graduate of the Yale Law School and has served as a District Court judge since 2011. Before taking the federal bench, Judge Kronstadt served as a Los Angeles County Superior Court judge beginning in 2002. Before then, Judge Kronstadt spent 24 years in private practice specializing in complex civil litigation. Judge Kronstadt also has no pending MDL cases. As such, Judge Kronstadt has the expertise and resources necessary to properly manage this litigation.

III. CONCLUSION

For all of the foregoing reasons, the *Hernandez* Plaintiffs respectfully request that the Panel grant the *Altier* and *Samouris* Plaintiffs' Motion to transfer and centralize the actions in the Central District of California. In addition, as the judge with the lowest-docketed action, and in light of his experience and credentials, the Honorable John A. Kronstadt would be an excellent choice for transferee judge.

[9] *Pending MDLs by District*, Judicial Panel on Multidistrict Litigation (May 15, 2019), https://www.jpml.uscourts.gov/sites/jpml/files/Pending_MDL_Dockets_By_District-May-15-2019.pdf.

Dated: June 28, 2019

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BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION

IN RE: ZF- TRW Airbag Control Units Product Liability Litigation

MDL No. 2905

PROOF OF SERVICE

In compliance with Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I hereby certify that copies of the foregoing Notice of Appearance was served on all parties in the following cases electronically via ECF, or as indicated below, on June 28, 2019.

Respectfully Submitted,

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