

SUPREME COURT OF TEXAS

DaimlerChrysler Corporation v. Bill Inman, David Castro, and John Wilkins, Each Individually and on Behalf of All Others Similarly Situated

252 S.W.3d 299 (Tex. 2008) · No. 03-1189 · Decided February 1, 2008

SUMMARY

The Supreme Court of Texas held that the named plaintiffs lacked standing to pursue claims concerning allegedly defective Gen-3 seatbelt buckles because their alleged injuries were hypothetical and insufficiently concrete. The Court reversed the court of appeals and dismissed the putative nationwide class action for want of jurisdiction.

CASE DETAILS

COURT	Supreme Court of Texas
WRITING FOR THE COURT	Nathan L. Hecht; Justice Wainwright; Justice Brister; Justice Medina; Justice Willett; Chief Justice Jefferson; Justice O'Neill; Justice Green; Justice Johnson
JURISDICTION	Texas
DECIDED	February 1, 2008
DOCKET	03-1189
DISPOSITION	reversed
PROCEDURAL POSTURE	DaimlerChrysler petitioned for review of an intermediate appellate decision reversing class certification and remanding for further proceedings. The Texas Supreme Court granted review to decide whether the named plaintiffs had standing to assert claims based on an allegedly defective seatbelt buckle that had not caused them injury.
STANDARD OF REVIEW	The court reviewed the standing issue as a question of subject-matter jurisdiction. Standing requires a personally aggrieved plaintiff with a concrete and particularized, actual or imminent injury.
PRECEDENTIAL VALUE	published and precedential opinion of the Supreme Court of Texas
PARTIES	DaimlerChrysler Corporation v. Bill Inman, David Castro, John Wilkins, Putative nationwide class of similarly situated vehicle owners and lessees

TOPICS

standing

subject matter jurisdiction

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the named plaintiffs had standing to assert claims based on the alleged possibility that their seatbelt buckles might accidentally unlatch and cause future injury.
2. Whether the absence of standing required dismissal of the entire putative class action for lack of subject-matter jurisdiction.

HOLDINGS

1. The named plaintiffs lacked standing because they had not shown a concrete, particularized, actual, or imminent injury; the alleged possibility of accidental seatbelt-buckle release was too remote and hypothetical.
2. When the named plaintiffs in a putative class action lack standing to assert their own individual claims, the entire action must be dismissed for want of jurisdiction.

KEY QUOTATIONS

“For standing, a plaintiff must be personally aggrieved; his alleged injury must be concrete and particularized, actual or imminent, not hypothetical.”

“If the named plaintiffs in a putative class action do not have standing to assert their own individual claims, the entire action must be dismissed.”

FACTUAL BACKGROUND

The plaintiffs owned or leased DaimlerChrysler vehicles equipped with Gen-3 seatbelt buckles and alleged that the buckles were too easy to unlatch accidentally. Castro and Wilkins had never experienced a buckle problem, and Inman was unsure whether his buckle had accidentally released twice; none of the plaintiffs had been injured or endangered. They sought the cost of replacing the buckles and related lost-use damages, but not damages for personal injury, property damage, or death.

PROCEDURAL HISTORY

Inman initially sued DaimlerChrysler in Nueces County in 2000, and Castro and Wilkins later joined the suit. The trial court denied DaimlerChrysler's summary-judgment motion and certified two classes. The court of appeals reversed the class certification and remanded for further consideration of applicable state law, but rejected DaimlerChrysler's standing argument. The Texas Supreme Court reversed and dismissed the action for want of jurisdiction.

DISPOSITION

reversed

CASES CITED

- Quacchia v. DaimlerChrysler Corp., 19 Cal. Rptr. 3d 508 (Cal. Ct. App. 2004)
- Hiller v. DaimlerChrysler Corp., No. 02-681, 2007 Mass. Super. LEXIS 442, 2007 WL 3260199 (Mass. Super. Ct. Sept. 25, 2007)
- Coker v. DaimlerChrysler Corp., 220 F. Supp. 2d 1367 (N.D. Ga. 2002)
- Sylvester v. DaimlerChrysler Corp., No. 1:02CV0567, 2002 U.S. Dist. LEXIS 17989, 2002 WL 32005242 (N.D. Ohio Mar. 25, 2002)
- Intratex Gas Co. v. Beeson, 22 S.W.3d 398, 404 (Tex. 2000)
- Eisen v. Carlisle & Jacquelin, 417 U.S. 156, 178 (1974)
- Miller v. Mackey Int'l, 452 F.2d 424 (5th Cir. 1971)
- Texas Ass'n of Bus. v. Tex. Air Control Bd., 852 S.W.2d 440, 444-446 (Tex. 1993)
- Plas-Tex, Inc. v. U.S. Steel Corp., 772 S.W.2d 442, 443-445 (Tex. 1989)
- Compaq Computer Corp. v. Lapray, 135 S.W.3d 657, 679 (Tex. 2004)
- Collins v. DaimlerChrysler Corp., 894 So. 2d 988 (Fla. Dist. Ct. App. 2004)
- M.D. Anderson Cancer Ctr. v. Novak, 52 S.W.3d 704, 706-711 (Tex. 2001)
- Rivera v. Wyeth-Ayerst Labs., 283 F.3d 315, 316-322 (5th Cir. 2002)
- Cole v. Gen. Motors Corp., 484 F.3d 717, 718-723, 730 (5th Cir. 2007)
- Nissan Motor Co. v. Armstrong, 145 S.W.3d 131, 140 (Tex. 2004)
- Austin Nursing Ctr., Inc. v. Lovato, 171 S.W.3d 845, 849 (Tex. 2005)
- Nootsie, Ltd. v. Williamson County Appraisal Dist., 925 S.W.2d 659, 661-662 (Tex. 1996)
- Martinez v. Second Injury Fund of Tex., 789 S.W.2d 267, 277 (Tex. 1990)
- West v. Brenntag Sw., Inc., 168 S.W.3d 327, 339 (Tex. App.—Texarkana 2005, pet. denied)
- Steel Co. v. Citizens for a Better Env't, 523 U.S. 83, 94 (1998)