

SUPREME COURT OF TEXAS

Kia Motors Corp. v. Ruiz

432 S.W.3d 865 (Tex. 2014) · Decided March 28, 2014

SUMMARY

The Texas Supreme Court considered a products-liability action arising from the failure of a driver's-side frontal air bag to deploy during a collision. The Court held that Texas Civil Practice and Remedies Code section 82.008's rebuttable presumption of nonliability did not apply because FMVSS 208 did not govern the risk of air-bag deployment failure, and that the evidence was legally sufficient to support the negligent-design finding. However, the Court held that the trial court improperly admitted a spreadsheet of warranty claims, that Kia preserved the error, and that the error was harmful, requiring a new trial.

CASE DETAILS

COURT	Supreme Court of Texas
WRITING FOR THE COURT	Justice Lehrmann; Justice Boyd (did not participate)
JURISDICTION	Texas
DECIDED	March 28, 2014
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Kia petitioned the Supreme Court of Texas for review after the court of appeals affirmed a trial-court judgment entered on a jury verdict for the Ruiz family in a negligent-design products-liability action.
STANDARD OF REVIEW	Statutory construction was reviewed de novo. Legal sufficiency was reviewed under the no-evidence standard, crediting favorable evidence that reasonable jurors could credit and disregarding contrary evidence unless reasonable jurors could not. Evidentiary rulings were reviewed for abuse of discretion; harm was reviewed under Texas Rule of Appellate Procedure 61.1.
PRECEDENTIAL VALUE	published opinion; precedential
PARTIES	Kia Motors Corporation, Kia Motors America, Inc. v. Lawrence Ruiz, individually and as representative of the estate of Andrea Ruiz, Shenequa Ruiz, Christopher Ruiz, Suzanna Ruiz

TOPICS

products liability

statutory interpretation

relevance

evidence

expert testimony

PRACTICE AREAS

products liability

evidence

statutory interpretation

appellate review

QUESTIONS PRESENTED

1. Whether Texas Civil Practice and Remedies Code section 82.008 created a rebuttable presumption of nonliability based on the Spectra's compliance with Federal Motor Vehicle Safety Standard 208.
2. Whether the evidence was legally sufficient to support the jury's negligent-design finding.
3. Whether the trial court erred by admitting the spreadsheet of warranty claims involving air-bag circuitry.
4. Whether Kia preserved its objection to the spreadsheet and whether its admission was harmful.

HOLDINGS

1. Compliance with FMVSS 208 did not trigger section 82.008's rebuttable presumption because FMVSS 208 did not govern the product risk alleged to have caused the injury: failure of the driver's-side air bag to reliably activate and deploy.
2. Section 82.008 does not require a federal regulation to mandate a particular product design; a manufacturer's chosen design may comply with a performance-based safety standard. That interpretation does not, however, make FMVSS 208 applicable here because the standard did not govern the relevant deployment-failure risk.
3. The Ruiz family presented legally sufficient evidence to support the jury's negligent-design finding.
4. The trial court erred in admitting the spreadsheet because substantial portions were irrelevant, and Kia preserved its objection without requesting a limiting instruction.
5. Admission of the spreadsheet was harmful because it probably resulted in an improper judgment.

KEY QUOTATIONS

“Interpreting section 82.008 to apply only to federal design standards impermissibly adds language and alters the statute’s plain meaning.” (at 872)

“A significant difference exists between an inadequate standard and a standard that simply does not contemplate the risk at issue.” (at 874)

“We hold that Mahon’s testimony “does not present a case where ‘there is simply too great an analytical gap between the data and the opinion proffered,’ or where the expert’s testimony amounted to nothing more than a recitation of his credentials and a subjective opinion.”” (at 878)

“For these reasons, we hold that the trial court erred in admitting the spreadsheet.” (at 883)

“On this record, Kia has demonstrated, and we hold, that the erroneously admitted spreadsheet probably caused the rendition of an improper judgment.” (at 884)

FACTUAL BACKGROUND

Andrea Ruiz was driving a 2002 Kia Spectra in a head-on collision while wearing her seat belt; the passenger-side air bag deployed, but the driver's-side air bag did not, and Andrea died from neck injuries. The parties agreed that the air bag should have deployed and that an open circuit prevented deployment. The Ruiz family's expert traced the likely source to design deficiencies in connectors in the air-bag wiring harness and identified safer, feasible alternative connector designs. At trial, the court admitted a spreadsheet summarizing 432 warranty claims, including 67 claims involving a code associated with open circuits.

PROCEDURAL HISTORY

The Ruiz family sued Kia over the failure of a driver's-side frontal air bag to deploy in a collision. A jury found negligent design and proximate cause, apportioned 45 percent responsibility to Kia, and awarded compensatory and exemplary damages; the trial court disregarded the gross-negligence and exemplary-damages findings because the negligence verdict was not unanimous and entered judgment for \$887,400 against Kia. The court of appeals affirmed. The Supreme Court of Texas agreed that the statutory presumption did not apply and that the evidence was legally sufficient, but held that the spreadsheet of warranty claims was improperly admitted and that the error was harmful, requiring a new trial.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The judgment of the court of appeals was reversed, and the case was remanded to the trial court for a new trial and further proceedings consistent with the opinion.

CASES CITED

- *Molinet v. Kimbrell*, 356 S.W.3d 407, 411 (Tex. 2011)
- *Am. Zurich Ins. Co. v. Samudio*, 370 S.W.3d 363, 368 (Tex. 2012)
- *Prairie View A&M Univ. v. Chatha*, 381 S.W.3d 500, 507 (Tex. 2012)
- *Perry v. Mercedes Benz of N. Am., Inc.*, 957 F.2d 1257, 1260 (5th Cir. 1992)
- *Wright v. Ford Motor Co.*, 508 F.3d 263, 270-72 (5th Cir. 2007)
- *Trenado v. Cooper Tire & Rubber Co.*, 465 F. App'x 375, 377, 379-80 (5th Cir. 2012)
- *King Ranch, Inc. v. Chapman*, 118 S.W.3d 742, 751 (Tex. 2003)
- *Ford Motor Co. v. Ridgway*, 135 S.W.3d 598, 601 (Tex. 2004)
- *Whirlpool Corp. v. Camacho*, 298 S.W.3d 631, 638 (Tex. 2009)
- *City of Keller v. Wilson*, 168 S.W.3d 802, 827 (Tex. 2005)
- *Wal-Mart Stores, Inc. v. Sturges*, 52 S.W.3d 711, 715 n.4 (Tex. 2001)
- *Nissan Motor Co. v. Armstrong*, 145 S.W.3d 131, 137-38, 141-42, 144 (Tex. 2004)
- *Cooper Tire & Rubber Co. v. Mendez*, 204 S.W.3d 797, 801, 803-07 (Tex. 2006)

- Ford Motor Co. v. Ledesma, 242 S.W.3d 32, 40 (Tex. 2007)
- Gammill v. Jack Williams Chevrolet, Inc., 972 S.W.2d 713, 726 (Tex. 1998)
- Transcontinental Ins. Co. v. Crump, 330 S.W.3d 211, 218 (Tex. 2010)
- U-Haul Int'l, Inc. v. Waldrip, 380 S.W.3d 118, 132 (Tex. 2012)
- TXI Transp. Co. v. Hughes, 306 S.W.3d 230, 241 (Tex. 2010)
- Gen. Chem. Corp. v. De La Lastra, 852 S.W.2d 916, 921 (Tex. 1993)
- E-Z Mart Stores, Inc. v. Terry, 794 S.W.2d 63, 65 (Tex. App.—Texarkana 1990, writ denied)

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