

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Danny Harrison et al. v. General Motors, LLC

Harrison · No. 21-12927 · Decided February 17, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan denied plaintiffs’ motion to sever claims concerning alleged valve-train defects in General Motors vehicles with Active Fuel Management and Dynamic Fuel Management engines. The court concluded that severance would not promote settlement or judicial economy, that potential jury confusion could be addressed through protective measures, and that overlapping evidence supported maintaining a single case.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Laurie J. Michelson
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	February 17, 2026
DOCKET	21-12927
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved under Federal Rule of Civil Procedure 21 to sever claims concerning vehicles equipped with Active Fuel Management engines from claims concerning vehicles equipped with Dynamic Fuel Management engines. Defendant opposed the motion.
STANDARD OF REVIEW	Motions to sever under Federal Rule of Civil Procedure 21 are committed to the district court's broad discretion.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Danny Harrison et al., Plaintiffs v. General Motors, LLC, Defendant

TOPICS

- joinder
- civil procedure
- commercial litigation
- consumer protection

PRACTICE AREAS

civil procedure

consumer protection

commercial litigation

products liability

QUESTIONS PRESENTED

1. Whether the court should sever the AFM and DFM claims under Federal Rule of Civil Procedure 21.
2. Whether the differences between the AFM and DFM engines, including potentially different components and evidence, outweighed the common factual, legal, witness, and documentary overlap such that severance would promote judicial economy or avoid prejudice.

HOLDINGS

1. The court denied the motion to sever because, despite differences between the AFM and DFM vehicles and alleged defects, the claims had sufficient overlap in evidence, witnesses, and issues to proceed in a single case.

KEY QUOTATIONS

“District courts are afforded “broad discretion in determining whether or not actions should be severed.””

“Any potential for jury confusion or undue prejudice can be satisfactorily mitigated through other protective measures” such as careful jury instructions.”

“Single trials generally tend to lessen the delay, expense and inconvenience to all concerned.”

FACTUAL BACKGROUND

Danny Harrison and 38 other plaintiffs purchased new or pre-owned General Motors vehicles from model years 2014 through 2021. They alleged that the vehicles shared a valve-train defect causing misfires, stalling, surging, power loss, and related engine noises. Plaintiffs later sought to divide the litigation between vehicles using Active Fuel Management technology and those using Dynamic Fuel Management technology, asserting that the groups involved different defective components.

PROCEDURAL HISTORY

Plaintiffs filed the action in December 2021 and later filed two amended complaints. The court previously granted in part two motions to dismiss and a motion to compel arbitration. After substantial discovery, unsuccessful facilitation and mediation, and approximately four years of litigation, plaintiffs moved to sever the AFM and DFM claims. The court denied the motion.

DISPOSITION

other

CASES CITED

- Parchman v. SLM Corp., 896 F.3d 728, 733 (6th Cir. 2018)

- Johnson v. Advanced Bionics, LLC, No. 08-02376, 2011 WL 1323883, at *6 (W.D. Tenn. Apr. 4, 2011)
- Productive MD, LLC v. Aetna Health, Inc., 969 F. Supp. 2d 901, 940 (M.D. Tenn. 2013)
- Cashatt v. Ford Motor Co., No. 19-05886, 2023 WL 2646366, at *7 (W.D. Wash. Mar. 27, 2023)
- Patrick Collins, Inc. v. John Does 1-21, 282 F.R.D. 161, 166 (E.D. Mich.), report and recommendation adopted, 286 F.R.D. 319
- Mosley v. General Motors Corp., 497 F.2d 1330, 1332 (8th Cir. 1974)
- In re ZF-TRW Airbag Control Units Prods. Liab. Litig., No. 19-02905, 2021 WL 9181832, at *9 (C.D. Cal. Aug. 20, 2021)

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