

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

In re Chevy Bolt EV Battery Litigation

In re Chevy Bolt EV Battery Litigation · No. 2:20-CV-13256-TGB-CI · Decided December 22, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan ruled on five motions for reconsideration concerning the validity of requests to opt out of the settlement in the In re Chevy Bolt EV Battery Litigation. The court denied four motions and granted one in part, recognizing Margaret Landy’s opt-out request after the Settlement Administrator had inadvertently rejected it as duplicative. The court otherwise upheld the requirements for timely, personally signed opt-out requests and concluded that class members whose opt-outs were invalid could still submit settlement claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Terrence G. Berg
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	December 22, 2025
DOCKET	2:20-CV-13256-TGB-CI
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving five motions for reconsideration of the court's prior order concerning the validity of settlement-class members' requests to opt out of a class settlement.
STANDARD OF REVIEW	Under E.D. Mich. LR 7.1(h)(2)(A), reconsideration of a non-final order requires a showing that the court made a mistake, correcting the mistake would change the outcome, and the mistake was based on the record and law before the court when the prior decision was entered. Reconsideration is not available to rehash rejected arguments or raise arguments that could have been made earlier.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- motion for reconsideration
- class actions
- civil procedure

PRACTICE AREAS

civil procedure

class actions

consumer protection

QUESTIONS PRESENTED

1. Whether Gomez and Tasharrofi demonstrated a qualifying mistake warranting reconsideration of the prior determination that electronically signed opt-out requests were invalid.
2. Whether due process required the Settlement Administrator to notify class members of defects in their opt-out requests and provide an opportunity to cure.
3. Whether MFS Legal Inc.'s and Strategic Legal Practices, LLP's movants were entitled to an extension of the opt-out deadline or validation of mass opt-out requests.
4. Whether Strategic Legal Practices, LLP's motion was timely under E.D. Mich. LR 7.1(h)(2).
5. Whether the Manookian Movants demonstrated a qualifying mistake concerning Margaret Landy's opt-out request, the personal-signature requirement, the percentage of valid opt-outs, or the availability of recovery and a second opportunity to object.

HOLDINGS

1. A motion to reconsider a non-final order under E.D. Mich. LR 7.1(h)(2)(A) requires the movant to show a court mistake, that correction of the mistake would change the prior outcome, and that the mistake was based on the record and law existing when the prior decision was entered.
2. Movants who submitted electronically signed opt-out requests did not establish grounds for reconsideration where the court had previously required personal physical signatures and had already rejected the same substantial-compliance arguments.
3. Due process did not require the Settlement Administrator to notify class members of defects in their opt-out requests or provide an opportunity to cure where the class received fully descriptive notice explaining the right, time, and manner of opting out.
4. The MFS Legal Inc. movants were not entitled to reconsideration, an extension of the opt-out deadline, or treatment of previously submitted mass opt-out requests as valid.
5. Strategic Legal Practices, LLP's motion for reconsideration was untimely because it was filed more than 14 days after entry of the order being challenged.
6. Margaret Landy submitted a valid and timely opt-out request, and her name was properly added to the amended exclusion list.
7. Due process did not require a second objection period for class members whose opt-out requests were invalid, and the request for such an opportunity was denied as a new argument raised for the first time on reconsideration.

KEY QUOTATIONS

“Fundamentally, ‘a motion for reconsideration is not a second bite at the apple[.]’” (Legal Standard)

“Opt-out requests that did not include the Movants’ personal signatures, and instead included an electronic signature, were properly denied by the Settlement Administrator.” (PageID.14319–21)

“The Manookian Movants’ motion for reconsideration is therefore GRANTED IN PART as to Movant Margaret Landy only, and otherwise DENIED.” (Section IV)

FACTUAL BACKGROUND

The case is a putative class action alleging defects in the battery systems of 2017–2022 Chevrolet Bolt electric vehicles. The court-approved settlement required class members seeking exclusion to submit opt-out requests by specified deadlines and required personal physical or wet-ink signatures; mass opt-outs and electronic signatures were not accepted. The Settlement Administrator rejected various requests, prompting challenges and motions for reconsideration. The Administrator later confirmed that Margaret Landy’s personally signed June 9, 2025 request had been timely received but was mistakenly rejected as duplicative.

PROCEDURAL HISTORY

The court preliminarily approved a putative class settlement and established deadlines and procedures for opting out. After the Settlement Administrator rejected certain opt-out requests, the court issued an October 17, 2025 order resolving challenges to those determinations. Various movants then sought reconsideration under Eastern District of Michigan Local Rule 7.1(h)(2). The court denied four motions, granted the Manookian Movants’ motion in part as to Margaret Landy, and denied it otherwise.

DISPOSITION

other

CASES CITED

- Hillman Power Co. v. OnSite Equip. Maint., Inc., 582 F. Supp. 3d 511, 514 (E.D. Mich. 2022)
- Smith ex rel. Smith v. Mount Pleasant Pub. Sch., 298 F. Supp. 2d 636, 637 (E.D. Mich. 2003)
- Masjid Malcolm Shabazz House of Worship, Inc. v. City of Inkster, No. 19-cv-11823, 2022 WL 866402, at *7 (E.D. Mich. Mar. 23, 2022)
- Collins v. National General Insurance Co., 834 F. Supp. 2d 632, 641 (E.D. Mich. 2011)
- In re Navistar Maxxforce Engines Marketing, Sales Practices, and Products Liability Litigation, 990 F.3d 1048, 1053–54 (7th Cir. 2021)
- Southfield Educ. Ass’n v. Bd. of Educ. of Southfield Pub. Sch., 319 F. Supp. 3d 898, 901 (E.D. Mich. 2018)
- Fischer v. United States, 589 F. Supp. 3d 726, 728 (E.D. Mich. 2022)
- In re Deepwater Horizon Seacor Holdings, Inc., 819 F.3d 190, 196–97 (5th Cir. 2016)
- Phillips Petroleum Co. v. Shutts, 472 U.S. 797, 812 (1985)
- In re Automotive Parts Antitrust Litigation, No. 12-MD-02311, 2019 WL 11005451, at *3 (E.D. Mich. Dec. 29, 2019)

- Saltmarsh v. VHS Children's Hospital of Michigan, Inc., 402 F. Supp. 3d 389, 393 (E.D. Mich. 2019),
aff'd, 831 F. App'x 784 (6th Cir. 2020)
- In re National Football League Players' Concussion Injury Litigation, 307 F.R.D. 351, 423 (E.D. Pa. 2015)

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