

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

Walter Helms, et al. v. General Motors, LLC

Helms · No. 2:22-cv-10783 · Decided November 25, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan denied Plaintiffs’ motion for leave to file a proposed amended complaint in a putative automotive-defect class action against General Motors. The court held that Plaintiffs did not demonstrate sufficient diligence or avoid undue prejudice to GM in seeking to substitute California plaintiffs and add 2023 and 2024 vehicle model years after the scheduling-order deadline. The decision applies Federal Rules of Civil Procedure 15(a) and 16(b).

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Mark A. Goldsmith
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	November 25, 2025
DOCKET	2:22-cv-10783
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs in a putative automotive-defect class action moved for leave to file a proposed third amended complaint, seeking to substitute California plaintiffs and add 2023 and 2024 vehicle model years. The district court denied the motion.
STANDARD OF REVIEW	The court applied Federal Rule of Civil Procedure 16(b)'s good-cause standard before considering Rule 15(a)'s liberal amendment standard. The decision on amendment was reviewed under the applicable diligence and prejudice considerations.
PRECEDENTIAL VALUE	Unknown
PARTIES	Walter Helms, et al. v. General Motors, LLC

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether plaintiffs showed good cause and diligence under Federal Rule of Civil Procedure 16(b) to amend the complaint after the scheduling-order deadline to substitute California plaintiffs.
2. Whether plaintiffs showed good cause and diligence under Rule 16(b), and satisfied Rule 15(a), to expand the putative class to include 2023 and 2024 vehicle model years.
3. Whether the proposed substitutions and expansion would unduly prejudice General Motors by requiring renewed arbitration proceedings, additional discovery, and delaying resolution of the case.

HOLDINGS

1. A party seeking to amend a complaint after the deadline in a scheduling order must first show good cause under Federal Rule of Civil Procedure 16(b); only then does the court consider whether amendment is proper under Rule 15(a).
2. Plaintiffs failed to establish good cause to substitute the California plaintiffs because they did not act diligently after learning that those plaintiffs had traded in their vehicle, and the substitution would prejudice GM by potentially requiring renewed arbitration litigation and delaying the case.
3. Plaintiffs failed to establish good cause to amend the complaint to add 2023 and 2024 model years because their unexplained delay demonstrated a lack of diligence and the amendment would unfairly prejudice GM through expanded fact and expert discovery and further delay.

KEY QUOTATIONS

“Together, these rules require a plaintiff seeking to amend a complaint after the scheduling order’s deadline passes to show good cause under Rule 16(b) before considering whether amendment is proper under Rule 15(a).”

“Plaintiffs have not demonstrated sufficient diligence regarding the substitution of plaintiffs.”

“The Court agrees with GM that it would be unfairly prejudiced if the Court were to permit Plaintiffs to amend to add model years.”

FACTUAL BACKGROUND

Plaintiffs alleged that 2019–2022 model-year vehicles equipped with GM's first-generation 8L90 and 8L45 transmissions suffered a transmission-related shift defect. Two California plaintiffs traded in their vehicle in May 2024, but plaintiffs did not seek their substitution until after the court's July 2025 status conference. Plaintiffs also sought to add 2023 and 2024 model years based on technical service bulletins that had been publicly available since January and October 2023, while GM contended that the newer vehicles involved a different, second-generation transmission and would require additional discovery.

PROCEDURAL HISTORY

Plaintiffs filed the putative class action in April 2022. The court later entered a scheduling order requiring good cause for amendments after August 30, 2023; granted a stay pending Sixth Circuit automotive-defect appeals; compelled certain plaintiffs to arbitration; and permitted earlier amendments. After the stay was lifted and plaintiffs filed a second amended complaint, they moved to substitute two California plaintiffs who had sold their vehicle and to expand the class to additional model years. The court denied leave based on lack of diligence and undue prejudice.

DISPOSITION

other

CASES CITED

- In re General Motors, LLC, No. 23-11044 (6th Cir. Oct. 23, 2023)
- In re Nissan North America, Inc., No. 23-0501 (6th Cir. Oct. 24, 2023)
- Speerly v. General Motors, LLC, 143 F.4th 306 (6th Cir. 2025)
- Seals v. Gen. Motors Corp., 546 F.3d 766, 770 (6th Cir. 2008)
- Leary v. Daeschner, 349 F.3d 888, 906, 909 (6th Cir. 2003)
- George v. Kraft Foods Global, Inc., 641 F.3d 786, 791 (6th Cir. 2011)
- Ford Motor Company Warranty Cases, 570 P.3d 857 (Cal. 2025)
- Phelps v. McClellan, 30 F.3d 658, 662–663 (6th Cir. 1994)

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