

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Mason Woodward, Individually and as Administrator of the Estate of
Christine Woodward v. General Motors, LLC

Woodward · No. 4:25-CV-1025 · Decided December 8, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania resolves a motion to strike affirmative defenses and a motion to dismiss a third-party complaint arising from a vehicle collision and alleged crashworthiness defects. The court strikes General Motors, LLC's spoliation defense, denies the challenge to its res judicata and collateral estoppel defense, dismisses its direct negligence and indemnification claims against Michael J. Brown, and permits its contribution claim to proceed. Discovery on the contribution claim is stayed pending the related Tioga County proceeding.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Matthew W. Brann
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 8, 2025
DOCKET	4:25-CV-1025
DISPOSITION	other
PROCEDURAL POSTURE	The court decided Mason Woodward's motion to strike affirmative defenses in General Motors, LLC's answer and Michael J. Brown's motion to dismiss GM's third-party complaint.
STANDARD OF REVIEW	On a Rule 12(f) motion, the moving party bears the burden of showing that challenged matter should be stricken; an affirmative defense must provide a concise statement of grounds demonstrating a logical relationship to the lawsuit. On a Rule 12(b)(6) motion directed to a third-party complaint, traditional plausibility pleading standards apply, and well-pleaded allegations are accepted as true.
PRECEDENTIAL VALUE	unpublished
PARTIES	Mason Woodward, individually and as administrator of the estate of Christine Woodward, Michael J. Brown v. General Motors, LLC

TOPICS

third party practice motions to dismiss affirmative defenses evidence civil procedure

PRACTICE AREAS

civil procedure products liability third-party practice pleading evidence

QUESTIONS PRESENTED

1. Whether GM's spoliation affirmative defense was properly pleaded and could remain in the answer.
2. Whether GM's res judicata and collateral-estoppel affirmative defense was sufficiently related to the litigation to avoid being stricken.
3. Whether GM could implead Brown on a direct negligence theory alleging Brown's liability to Woodward.
4. Whether GM could maintain a contribution claim against Brown where Woodward's federal claims against GM were based in part on crashworthiness and Woodward separately sued Brown for all injuries and death.
5. Whether discovery on the contribution claim should be stayed pending the related state-court proceeding.

HOLDINGS

1. Spoliation is an evidentiary doctrine, not an affirmative defense, and GM's spoliation defense was stricken.
2. The defense was not adequately supported in the answer, but it would not be stricken because GM identified potentially related matters in its opposition and amendment would be needlessly formal.
3. A third-party complaint may not assert a direct negligence claim seeking to establish Brown's liability to Woodward; GM's negligence count was dismissed with prejudice.
4. GM's contribution claim was sufficiently pleaded and was not subject to dismissal at the pleadings stage.
5. Discovery on GM's contribution claim was stayed pending resolution of the Tioga County proceeding concerning Brown's liability for Christine's injuries and death.

KEY QUOTATIONS

"Spoliation is not an affirmative defense, but rather an evidentiary doctrine." (Section II.A)

"third-party claims must be brought under a theory of derivative liability such as indemnification or contribution." (Section II.B.1)

"the concept of enhancement was developed as a means of delineating the basis for and extent of a manufacturer's responsibility to answer in damages for an injury." (Section II.B.2)

"The contribution claim is stayed pending the outcome of the related Tioga County proceeding between Mr. Woodward and Mr. Brown." (Conclusion)

FACTUAL BACKGROUND

Christine Woodward was driving a 2013 GMC Acadia in Pennsylvania when Michael J. Brown, traveling in the opposite direction, attempted to pass another vehicle and collided head-on with her. Christine survived the initial collision but was trapped when the vehicle caught fire and died. Woodward sued Brown in state court for all of Christine's injuries and death and sued GM in federal court under theories including defective crashworthiness, breach of warranty, negligence, and failure to warn or recall. GM impleaded Brown, alleging that Brown's conduct caused some or all of the injuries.

PROCEDURAL HISTORY

Woodward filed a six-count product-liability and tort complaint against GM in the Eastern District of Pennsylvania on February 4, 2025. The action was transferred to the Middle District of Pennsylvania on June 6, 2025. GM answered and asserted forty-nine affirmative defenses; Woodward moved to strike them, later limiting the motion to defenses 13 and 24. GM separately impleaded Brown, who moved to dismiss the third-party complaint. The court granted the motion to strike as to defense 13, denied it as to defense 24, dismissed GM's negligence and indemnification claims against Brown with prejudice, denied dismissal of the contribution claim, and stayed discovery on contribution pending the related Tioga County action.

DISPOSITION

other

CASES CITED

- Connelly v. Lane Construction Corp., 809 F.3d 780, 787 (3d Cir. 2016)
- Harsh v. Petroll, 887 A.2d 209, 211-19 (Pa. 2005)
- MIIX Ins. Co. v. Epstein, 937 A.2d 469, 474 (Pa. Super. Ct. 2007)
- McLaughlin v. Nahata, 260 A.3d 222, 230 (Pa. Super. Ct. 2021)
- F.D.I.C. v. Bathgate, 27 F.3d 850, 873 (3d Cir. 1994)
- Severson Env't Servs., Inc. v. Watersolve, LLC, No. 16-CV-5158, 2020 WL 3468209, at *2 (D.N.J. June 25, 2020)
- Twombly, 550 U.S. 544 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Herbert v. General Motors Corp., No. 05-CV-2152, 2006 WL 8449868, at *3 (M.D. Pa. Sept. 28, 2006)
- Nationwide Mut. Fire Ins. Co. v. George V. Hamilton, Inc., 571 F.3d 299, 310-12 (3d Cir. 2009)
- Shane v. Fauver, 213 F.3d 113, 116 (3d Cir. 2000)

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