

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Zhiguang Yao, et al. v. Daimler Trucks North America LLC, et al.

Yao v. Daimler Trucks North America LLC · No. 3:21-CV-784-CCB-SJF · Decided March 10, 2026

SUMMARY

The United States District Court for the Northern District of Indiana grants Daimler Trucks North America LLC’s motion for summary judgment in a products liability action arising from a tour bus accident. Applying Indiana law, the court holds that Daimler was a component-part manufacturer and had no duty to include electronic stability control because the feature was offered to, and rejected by, the final manufacturer. The court enters judgment as a matter of law for Daimler.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Cristal C. Brisco
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	March 10, 2026
DOCKET	3:21-CV-784-CCB-SJF
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Daimler Trucks North America LLC moved for summary judgment in a diversity products-liability action arising from a tour bus accident.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court construed the facts and reasonable inferences in favor of the nonmoving party.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Zhiguang Yao, et al. v. Daimler Trucks North America LLC, et al.

TOPICS

- products liability
- summary judgment
- negligence
- wrongful death
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Indiana or California law governed the claims after transfer from California.
2. Whether DTNA was entitled to summary judgment under Indiana's component-part manufacturer defense because it was a component-part manufacturer, electronic stability control was offered to SVO, and SVO rejected it.
3. Whether DTNA nevertheless owed downstream consumers a duty to include electronic stability control or warn them about its absence.

HOLDINGS

1. Indiana law governs the action because the acts relating to the sale of the subject chassis occurred in Indiana, and the plaintiffs could not obtain the benefit of California law after filing in a forum that lacked personal jurisdiction over DTNA and transferring the case.
2. A component-part manufacturer has no duty to include an optional safety feature that was offered to and rejected by the final manufacturer. DTNA established as a matter of law that it was a component-part manufacturer, that electronic stability control was offered to SVO, and that SVO rejected it.
3. The component-part manufacturer defense also defeats plaintiffs' undeveloped argument that DTNA had a duty to warn downstream consumers about the absence of electronic stability control and their argument that DTNA was not protected because it did not directly offer the feature to downstream purchasers.

KEY QUOTATIONS

“a component-part manufacturer “has no duty to include optional safety features that were offered to, and rejected by, the final manufacturer.”” (at 8)

“In the absence of any contradicting evidence, the Court finds that DTNA has established as a matter of law that ESC was offered to the final manufacturer.” (at 12)

“Thus, DTNA had no duty to include ESC and is entitled to judgment as a matter of law.” (at 13)

FACTUAL BACKGROUND

DTNA manufactured an incomplete truck chassis that was later configured by MOR/Ryde International and SVO Group into a tour bus. The bus crashed in Utah on September 20, 2019, and plaintiffs alleged that DTNA's failure to include optional electronic stability control caused their injuries. SVO, the final manufacturer, had ordered some DTNA chassis with electronic stability control and some without, and the subject chassis was ordered without the feature. Evidence showed that the feature was available, was discussed with SVO's owner, and was identified on an invoice as not included.

PROCEDURAL HISTORY

Plaintiffs filed suit in California asserting strict product liability, negligence, breach of implied warranty, and wrongful-death claims. The action was transferred to the Northern District of Indiana because the California court could not exercise personal jurisdiction over DTNA. The court previously held that Indiana law governed and declined to revisit that determination. On DTNA's motion for summary judgment, the court held that DTNA established the Indiana component-part manufacturer defense and granted judgment for DTNA.

DISPOSITION

other

CASES CITED

- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986)
- *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 587 (1986)
- *Heft v. Moore*, 351 F.3d 278, 282 (7th Cir. 2003)
- *Waldridge v. Am. Hoechst Corp.*, 24 F.3d 918, 920 (7th Cir. 1994)
- *Nelson v. Napolitano*, 657 F.3d 586, 590 (7th Cir. 2011)
- *United States v. Beavers*, 756 F.3d 1044, 1059 (7th Cir. 2014)
- *Robin v. Espo Eng'g Corp.*, 200 F.3d 1081, 1088 (7th Cir. 2000)
- *Ortiz v. Werner Enters., Inc.*, 834 F.3d 760 (7th Cir. 2016)
- *Hammel v. Eau Galle Cheese Factory*, 407 F.3d 852, 859 (7th Cir. 2005)
- *Goodman v. Nat'l Sec. Agency, Inc.*, 621 F.3d 651, 654 (7th Cir. 2010)
- *Van Dusen v. Barrack*, 376 U.S. 612, 616 (1964)
- *Gonzalez v. Volvo of Am. Corp.*, 734 F.2d 1221, 1224 (7th Cir. 1984)
- *Brewer v. PACCAR, Inc.*, 124 N.E.3d 616, 619, 621, 625 (Ind. 2019)
- *Atkinson v. P&G-Clairol, Inc.*, 813 F. Supp. 2d 1021, 1023-24 (N.D. Ind. 2011)
- *Jarrell v. Monsanto*, 528 N.E.2d 1158 (Ind. Ct. App. 1988)