

# Component Parts Doctrine Applied in Three Fatality Ohio Case

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The Ohio Court of Appeals upheld a **summary judgment** granted in favor of a component manufacturer (Sensata Technologies, Inc.) in a triple fatality case arising out of a fire that originated in a 2001 Ford Expedition.

Sensata manufactured a **speed control deactivation switch (SCDS)** that was installed in Ford Expedition brake and cruise control systems. The SCDS performed the function of deactivating the cruise control when the driver depressed the vehicle's brake. The National Highway Transportation Authority determined that the SCDS could cause a fire, even though the vehicle ignition was off, if three specific conditions were met: (1) the SCDS circuitry was energized at all times, (2) the SCDS orientation was not installed in a vertical down position, and (3) the brake system generated a high enough vacuum to flip the orientation of the seal within the SCDS.

The Court applied the component parts doctrine in favor of Senata. The component parts doctrine provides that manufacturer of a component part is not liable for a defect in the completed product unless the component itself is defective or dangerous, or the component manufacturer assembles the completed product or substantially participated in the design of the completed product. Ohio has applied the component parts doctrine in failure to warn cases and in statutory product liability claims.

Although there had been discussions between Senata and Ford during the design and development of the SCDS at issue, and Senata had been involved in analyzing fires allegedly caused by the SCDS, the Court concluded that the SCDS was not defective or dangerous. Additionally, the Court found that the SCDS was not defective in design, manufacture, or warnings, and that Senata was not a substantial participant in the design or assembly of the final product – the Ford Expedition.

The case contains a detailed discussion of the facts that will or will not be sufficient to establish or defeat a variety of claims under the component parts doctrine.

[\*Romans v. Texas Instruments, Inc.\*, No. CA2013-04-012, 2013 WL 6094299 \(Ohio App. November 18, 2013\)](#)

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