No Punitive Damages in Coffee Maker Case

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In *Vaughn v. North American Systems Inc.*, 869 S.W.2d 757 (Mo. 1994), the Missouri Supreme Court held that a plaintiff cannot recover punitive damages against a coffee maker manufacturer for incorporating an electric clock into an automatic coffee maker, unless the plaintiff can show that the clock proximately caused the damages she suffered.

A coffee maker brews an injury

On May 16, 1986, plaintiff Cindy Vaughn turned on her automatic “Mr. Coffee” coffee maker and poured vinegar into it to clean it. Leaving the coffee maker plugged in, she went to take a shower. When she finished the shower, she found her bathroom filled with smoke. Plaintiff traced the source of the smoke to her kitchen where she saw “flames shooting out of the top of the Mr. Coffee.” Although her coffee maker came with instructions advising users to unplug the machine when not in use, it used an electric clock that worked only if the it was plugged in.

Vaughn brought a products-liability action against North American Systems, Inc., claiming that the automatic coffee maker it manufactured started the fire in her home, resulting in $15,000 property damage. She asserted that the coffee maker should have contained a non-programmable, instead of a programmable, electric clock. She reasoned that the programmable clock made the coffee maker unreasonably susceptible to catching fire, because in order for the clock to run and not require daily resetting, the coffee maker had to be plugged in at all times. The jury returned a $15,000 verdict in her favor, but the trial court granted the defendant’s motion for a directed verdict on the plaintiff’s punitive damages claim.

Punitive damages claim based on coffee maker history

On appeal to the Missouri Supreme Court, Vaughn contended that she had presented evidence at trial which entitled her to submit the issue of punitive damages to the jury. During the trial, plaintiff showed that a group established by coffee maker manufacturers (the International Conference for Coffee Makers), held an “Unplug It” campaign during the late 1970s and early 1980s urging consumers to unplug their automatic drip coffee makers to reduce fire risks.

In addition, Vaughn introduced a report by the United States Consumer Products Safety Commission stating that there were 2,720 residential fires caused by automatic-drip coffee makers in 1982. Her evidence also indicated that the defendant had received a copy of the report and had attended an industry meeting where the report was discussed.

The trial court, however, refused to admit the portion of the report which criticized the industry’s use of programmable, rather than non-programmable, electric clocks in coffee makers. Because the coffee makers had to be plugged in for the electric clock to work, the report concluded, using programmable timers was inconsistent with efforts to encourage consumers to unplug their coffee makers after use.

The electronic timer did not cause the fire

The Missouri Supreme Court ignored the evidentiary question, but found that Vaughn could not support her claim for punitive damages because she failed to show the necessary causation. The court found the electric-clock argument irrelevant to Vaughn’s case because she had left the coffee maker switched on and plugged in while she cleaned it. The programmable electric clock had nothing to do with the cause of the fire: she would have cleaned her coffee maker in the same way even if the coffee maker contained a non-programmable clock.

The damage resulting from a coffee maker both turned on and plugged in could not have been caused by an electric clock which required the coffee maker to be turned off and plugged in when not in use.

Plaintiff must show causation when claiming damages

Having found that the electric clock did not cause the fire in the plaintiff’s coffee maker, the court explained the role of causation in tort law. In every tort claim, a plaintiff must show that the damages she incurred are a direct result of the wrongful acts alleged, regardless of whether or not the damages sought are compensatory or punitive. The court noted that the purpose of punitive damages is to punish and deter the defendant from similar conduct. Citing both recent and older case law, the court stated that punitive damages awarded must bear some reasonable relation to the injury and its cause. Finally, the court found that a plaintiff must satisfy the “but for” test as an absolute minimum for establishing causation. Since in this case plaintiff’s punitive damages claim could not satisfy the “but for” test (i.e.: the fire would not have started “but for” the electric clock), the court upheld the trial court’s judgment granting defendant’s motion for directed verdict.

—William Hahn