# 7.13 Integrated Product Manufacturer’s Duty to Warn

On the plaintiff’s duty to warn claim, the plaintiff has the burden of proving the following elements by a preponderance of the evidence:

First, the defendant manufactured a product that required the incorporation of a part for the integrated product to function as intended;

Second, the defendant knew or had reason to know that the integrated product was likely to be dangerous for its intended use[s];

Third, the defendant had no reason to believe that the product’s users would realize that danger; and

Fourth, the product’s dangerous condition caused foreseeable injury to the plaintiff.

If you find the plaintiff has proven the elements on which [he] [she] has the burden of proof, your verdict should be for the plaintiff. If, on the other hand, the plaintiff has failed to prove any of these elements, your verdict should be for the defendant.

**Comment**

*See Air & Liquid Sys. Corp. v. DeVries*, 586 U.S. 446, 457 (2019).

*Revised March 2025*