**1201. Strict Liability—Manufacturing Defect—Essential Factual Elements**

**[***Name of plaintiff***] claims that the [***product***] contained a manufacturing defect. To establish this claim, [***name of plaintiff***] must prove all of the following:**

1. **That [*name of defendant*] [manufactured/distributed/sold] the [*product*];**
2. **That the [*product*] contained a manufacturing defect when it left [*name of defendant*]’s possession;**
3. **That [*name of plaintiff*] was harmed; and**
4. **That the [*product*]’s defect was a substantial factor in causing**

**[*name of plaintiff*]’s harm.**

*New September 2003; Revised April 2009, December 2009, June 2011, May 2020*