

SUMMARY STATEMENT

Eagle Equity Fund, LLC v. Title One Corp., Docket No. 42850

In a case arising out of Ada County, the Idaho Supreme Court affirmed the district court's summary judgment dismissal of Eagle Equity Fund's claims for tortious interference with a prospective economic advantage and negligent reconveyance under Idaho Code section 45-1205. The Court further held that the district court had not abused its discretion when it refused to allow Eagle Equity Fund to amend its complaint to add a quiet title claim.

Specifically, the Court reasoned that: (1) tortious interference with a prospective economic advantage is a common law cause of action, which is not available in the improper reconveyance context under Idaho Code section 45-1205; (2) the measure of damages for a secured party resulting from the improper reconveyance of a piece of property is the fair market value of the property as of the date of the reconveyance less prior encumbrances, not, however, to exceed the amount secured by the property—Eagle Equity Fund failed to provide sufficient evidence that the fair market value of the security property as of the date of the reconveyance was greater than the amount of higher priority encumbrances; and (3) Eagle Equity Fund had no valid claim to any interest in the property and, accordingly, it could not possibly succeed on a quiet title claim. Attorney's fees on appeal were granted to Respondents under Idaho Code section 12-121.