

SUMMARY STATEMENT
Streamline Builders, LLC v. Chase
Docket No. 50953-2023

The Idaho Supreme Court affirmed the judgment against Steven Chase for tortious interference with prospective economic advantage. This case arises from a failed real estate transaction and concerns the denial of a motion for directed verdict on a claim for tortious interference with prospective economic advantage. Audrey Chase contracted with Streamline Builders, LLC, owned by Richard Swoboda, for the construction and purchase of a home. Audrey's son, Steven Chase, accompanied her to various meetings regarding the transaction and engaged in communications with Swoboda and realtors.

The parties never closed on the purchase of the home due to a disagreement about what terms should be included in a holdback agreement that was among the closing documents. Streamline and Swoboda brought a claim against Steven for intentional interference with prospective economic advantage. A jury trial was held, and Steven moved for a directed verdict. The district court denied the motion on the claim for tortious interference with prospective economic advantage and allowed the claim to be submitted to the jury. The jury returned a verdict in favor of Streamline and Swoboda on the tortious interference with prospective economic advantage claim and the district court entered a judgment against Steven.

On appeal, Steven argued that the district court erred in denying his motion for directed verdict. He argued that he cannot be liable on the claim because he was acting as his mother's agent and thus was not a stranger to the agreement. Streamline and Swoboda contended that this defense was not preserved for appeal and that Steven did not establish that he was at all times Audrey's agent.

The Idaho Supreme Court affirmed the judgment against Steven for tortious interference with prospective economic advantage. The Court determined that Steven failed to preserve his agency argument for appeal because he did not present it to the district court as a basis for granting his motion for a directed verdict. Accordingly, the Court held that the district court correctly denied Steven's motion for a directed verdict and affirmed the judgment against him.

This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.