

SUMMARY STATEMENT

Johnson v. Beadz Brothers Farms
Docket No. 50970

This appeal arises from the death of Colby Johnson on Beadz Brothers Farms in the early morning hours of August 18, 2020. Colby was apparently attempting to repair the connection between a truck and a Double L, Goldline Series self-unloading bed when he became caught in a rotating shaft and died from his injuries. Colby's father, Harry Johnson (Appellant), filed an action against multiple defendants, including Beadz Brothers, after Colby's death. Appellant argued that Colby's death was caused by Beadz Brothers' negligence.

Beadz Brothers filed a motion for summary judgment on Appellant's negligence claims, arguing that his claims were barred by the exclusive remedy rule in Idaho's worker's compensation law. Appellant challenged the admissibility of Beadz Brothers' supporting documents and opposed the summary judgment motion. He requested a continuance of the summary judgment hearing to conduct more discovery, explaining that he needed more time because he did not have necessary facts to adequately oppose the Beadz Brothers' motion. Appellant contended there were issues of fact related to Colby's employment status and the applicability of worker's compensation law that required a trial. Appellant also argued that the "unprovoked physical aggression" exception applied to remove his claims from the realm of worker's compensation law.

The district court denied Appellant's request for a continuance and granted summary in favor of Beadz Brothers. The court did not consider most of Appellant's proposed exhibits because it determined they lacked foundation or were irrelevant. The district court considered Beadz Brothers' proposed exhibits as evidence of Colby's employment status. The district court explained that Appellant had failed to present evidence that raised factual issues that required a trial. The court determined that Colby was an employee of Beadz Brothers, and that worker's compensation law applied in this case. The district court determined that Appellant had not presented evidence that the "unprovoked physical aggression" exception applied to remove his claims from the realm of worker's compensation law, and that his negligence claims were barred by the exclusive remedy rule. Appellant appealed to the Idaho Supreme Court.

The Idaho Supreme Court affirmed the judgment of the district court. First, the Court determined that the district court acted within its discretion when it denied Appellant's request for a continuance. Next, the Court determined the district court did not err or committed harmless error with respect to its evidentiary rulings. Finally, the Court held that summary judgment was appropriate on Appellant's claims because Appellant did not introduce enough evidence to show that Colby's employment status was a triable issue, or that the "unprovoked physical aggression" exception applied to his claims. The Idaho Supreme Court determined that the exclusive remedy rule in worker's compensation applied in this case and affirmed the district court's grant of summary judgment in favor of the Beadz Brothers.

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