

SUMMARY STATEMENT

Stasiewicz v. Henry's Lake Village, LLC

Docket No. 52313

This case arises from a dispute among neighboring property owners in Fremont County concerning roadway access rights along Bootjack Drive and Whitetail Lane in the Henry's Lake area. The plaintiffs, including Appellants Edward and Barbara Stasiewicz, filed suit to establish easements over land owned by Henry's Lake Village, LLC, and other neighboring properties (collectively referred to as "HLV"), alleging claims for express, implied, and prescriptive easements. The controversy primarily centers on the Stasiewiczes' 80-acre landlocked parcel.

HLV filed a motion to dismiss the complaint for lack of subject matter jurisdiction under Rule 12(b)(1). Pertinent here, HLV argued that the Stasiewiczes' easement claims were moot because HLV had previously granted the Stasiewiczes' express access easements for Bootjack Drive and Whitetail Lane in 2021 and 2022. Initially, the district court granted HLV's motion to dismiss in part, holding that the Stasiewiczes' claims for an express easement and prescriptive easement were rendered moot by the access easements granted by HLV. However, the district court declined to dismiss the Stasiewiczes' implied easement claim and instead requested supplemental briefing on whether a default judgment in a related quiet title action against the Stasiewiczes' predecessors in interest precluded their claims under the doctrine of res judicata. The Stasiewiczes and HLV filed supplemental briefing, declarations, and cross motions to strike portions of the declarations. Thereafter, the district court rejected the motions to strike without addressing the admissibility of the challenged evidence, explaining that it was denying the motions to strike "in order to provide resolution on the merits after fully considering the available facts to the [c]ourt." Next, the court granted HLV's motion to dismiss, holding that the Stasiewiczes' easement claims were rendered moot by the access easements granted by HLV and that the claims were precluded by res judicata.

On appeal, the Stasiewiczes challenged the district court's decisions on numerous grounds. In pertinent part, they argued that the district court erred by concluding that their easement claims were precluded by res judicata because the court improperly raised the issue sua sponte. They further argued that the court erred in concluding their easement claims were moot because the access easements granted by HLV contained significant restrictions.

The Idaho Supreme Court vacated the judgment of the district court, reversed its decision dismissing the Stasiewiczes' claims, and remanded the case for further proceedings. First, the Court agreed with the Stasiewiczes that the district court erred when it raised the res judicata defense sua sponte. Second, the Court concluded that, although the issue of whether the Stasiewiczes were entitled to an easement over Whitetail Lane was rendered moot by the unrestricted access easement HLV had granted, the district court erred when it dismissed as moot the Stasiewiczes' claim for an express easement over Bootjack Drive because the court applied an incorrect legal standard. The Court further determined that the district court erred when it concluded that the Stasiewiczes' claims for an implied and prescriptive easement over Bootjack Drive were rendered moot by the restricted access easements granted by HLV.

******This summary constitutes no part of the Court's opinion. It has been prepared by court staff for the convenience of the public.******