

**SUMMARY STATEMENT**  
*Knudsen v. J.R. Simplot Company*  
Docket No. 47020

This employment case arose from Ada County district court and concerned whether Knudsen could maintain a fraud action against his former employer for misrepresenting the nature of the job he was hired to perform.

J.R. Simplot Company (“Simplot”) hired Erik Knudsen for a position as a packaging engineer. Early on in his employment, Knudsen was told that he would be the startup manager on a Simplot project in Grand Forks, North Dakota. Knudsen was unfamiliar with the startup manager position and questioned whether those job duties were fairly within the scope of his employment as a packaging engineer. Simplot and Knudsen disagreed as to the nature of his job, leading to the eventual termination of Knudsen’s employment. After his dismissal, Knudsen filed this action, alleging fraud, promissory estoppel, breach of the covenant of good faith and fair dealing, and negligent infliction of emotional distress. The district court granted Simplot’s motion for summary judgment as to all of Knudsen’s claims and denied Simplot’s subsequent motion for attorney’s fees. Knudsen appealed the summary judgment rulings and Simplot cross-appealed the denial of its request for attorney’s fees.

The Idaho Supreme Court affirmed the district court’s grant of summary judgment in favor of Simplot and the district court’s denial of Simplot’s request for attorney’s fees. The Court held that hiring fraud was a cognizable cause of action in Idaho for an at-will employee. However, the Court held that summary judgment was appropriate on Knudsen’s fraud claim because he had not raised a triable issue of fact as to whether Simplot had defrauded him. Next, the Court held that summary judgment in favor of Simplot was appropriate on Knudsen’s promissory estoppel claim because the doctrine was inapplicable to this matter. The Court further held that summary judgment in Simplot’s favor was proper on Knudsen’s good faith and fair dealing claim because he did not demonstrate a triable issue of material fact as to whether Simplot deprived him of the benefit of any term of his employment agreement. Finally, the Court held that summary judgment in Simplot’s favor was appropriate on Knudsen’s negligent infliction of emotional distress claim because he had not demonstrated a triable issue of fact with respect to Simplot’s breach of any recognized legal duty for which emotional distress damages are recoverable.

With respect to Simplot’s cross-appeal, the Idaho Supreme Court held that the district court did not err in denying Simplot’s request for fees because Simplot did not provide a basis by which fees could be apportioned between the various claims.

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