

A white Lucosky Brookman garbage truck is shown from a side profile, partially obscured by a large blue rectangular overlay. The truck has a large rear-mounted compactor body. The text "CASE SUMMARIES" is written in large, bold, white capital letters across the center of the blue overlay. The truck's front cab is on the left, and the rear compactor is on the right. The background is a clear sky.

CASE SUMMARIES

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Pennsylvania / Eastern District

Court allows punitive damages against commercial driver and employer to proceed following distracted-driving crash.

Seng Long Kim v. Pierre, 2026 U.S. Dist. LEXIS 183077 (E.D. Pa. Aug. 17, 2026)

The Court granted in part and denied in part defendants' motion for partial summary judgment in a trucking accident case arising from a collision on Interstate 95. The Court found sufficient evidence for a jury to consider punitive damages against the commercial driver, including allegations that he was distracted, failed to respond to stopped traffic and emergency vehicles, and struck plaintiffs' vehicle at approximately 45 mph despite having time to react. Because punitive damages may be imposed vicariously under Pennsylvania law, that claim also proceeds against the driver's employer. However, the Court dismissed direct negligent hiring, training, supervision, and entrustment claims against the employer, finding the alleged regulatory deficiencies were not sufficiently tied to the driver's conduct.

Rhode Island / District of Rhode Island

Court largely dismisses state-law cargo claims as preempted by Carmack Amendment and FAAAA.

S.A.M. Pantaenius Monaco v. Save on Transp. Enters., LLC, 2026 U.S. Dist. LEXIS 182121 (D.R.I. Aug. 14, 2026)

The Court largely granted motions to dismiss state-law claims arising from the failed overland transport of a catamaran from Rhode Island to California. After the original carrier allegedly re-brokered the shipment, another carrier loaded the vessel, abandoned it roadside following a payment dispute, and the vessel was later destroyed by fire. The Court held that most claims against the carriers were preempted by the Carmack Amendment, rejecting arguments that transportation had ended merely because the vessel was temporarily stationary. It also rejected efforts to avoid preemption through conversion theories. Claims against brokerage entities were separately analyzed under the FAAAA, reinforcing the broad preemptive reach of federal transportation law in cargo-loss disputes.

Fifth Circuit / Texas

Court revives statutory-employer and broker negligent-hiring claims in fatal multi-carrier trucking accident.

Crane v. Penske Transp. Mgmt., L.L.C., 2026 U.S. App. LEXIS 23567 (5th Cir. Aug. 4, 2026)

The Fifth Circuit reversed summary judgment for Penske entities in a wrongful-death action arising from a tractor-trailer collision involving a shipment passed through multiple carriers. Although Penske did not hire the driver or own his truck, the Court held Penske Logistics could qualify as his statutory employer because its carrier-to-carrier arrangement triggered federal regulations requiring it to assume control and responsibility for the equipment. The Court also revived a negligent-hiring claim against Penske Transportation Management, relying on the Supreme Court's recent *Montgomery* decision holding that the FAAAA does not preempt broker negligent-hiring claims. The case was remanded for further proceedings on both theories of liability.