



CASE SUMMARIES

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Indiana / Southern District

Court dismisses direct negligence claims against motor carrier after scope of employment admission in fatal pedestrian collision.

Wilson-Love v. Dealer's Choice Truckaway Sys., 2026 U.S. Dist. LEXIS 88429 (S.D. Ind. Apr. 21, 2026)

The Court granted in part defendants' motions for judgment on the pleadings, dismissing direct negligence claims against TruckMovers arising from a fatal pedestrian accident involving its driver. The Court held that, under Indiana law, once an employer admits its driver was acting within the scope of employment, claims for negligent hiring, training, supervision, and entrustment are generally precluded and subsumed by respondeat superior. The Court rejected the plaintiff's arguments that federal regulations or alternative pleading standards preserved those claims. Other claims, including vicarious liability and certain damages theories, remain pending. The decision reinforces limits on expanding direct-liability theories in trucking cases where agency is undisputed.

Utah / Supreme Court

Court reverses dismissal of enhanced-injury claim, holding federal compliance does not foreclose broader negligence duties in underide crash.

Maldonado-Velasquez v. Ron J. Peterson Constr., Inc., 2026 UT 8 (Apr. 16, 2026)

The Utah Supreme Court reversed a partial summary judgment that had dismissed an enhanced-injury claim arising from a fatal underide collision with a construction trailer. The lower court had concluded the defendant owed no duty to modify or upgrade a trailer that complied with federal safety standards and excluded related expert testimony. The Supreme Court rejected that narrow framing, holding that existing statutory and common-law duties to operate equipment safely are not displaced by federal regulations and may support broader negligence theories. Because the district court improperly limited the scope of duty, it also erred in excluding expert testimony on underide risks and injury mitigation. The ruling allows the enhanced-injury theory to proceed.

Pennsylvania / Eastern District

Court finds logistics provider liable as carrier under Carmack Amendment, rejecting broker classification in cargo loss dispute.

Master Textile Mills, Ltd. v. RSA Global Logistics, LLC, 2026 U.S. Dist. LEXIS 91724 (E.D. Pa. Apr. 27, 2026)

Following a bench trial, the Court entered judgment against RSA Global Logistics, holding it liable under the Carmack Amendment for cargo destroyed when a truck fire occurred during interstate transport. The central issue was whether RSA acted as a broker or a carrier/freight forwarder. The Court found RSA assumed responsibility for the shipment under its agency agreement, coordinated transportation through downstream carriers, and held itself out as responsible for delivery, placing it in the role of a carrier despite not physically transporting the goods. The Court also dismissed plaintiff's breach of contract and bad faith claims as preempted by Carmack. RSA was held liable for the remaining \$168,000 loss beyond the downstream carrier's \$100,000 policy limit.