CASE SUMMARIES

Texas / Northern District
Court grants summary judgment for bus operator and driver, rejecting negligence claims where intoxicated third party caused collision.

Strong v. Paradise, 2025 U.S. Dist. LEXIS 255812 (N.D. Tex. Nov. 18, 2025)
The Court granted summary judgment in favor of Greyhound and its driver, finding no evidence that their conduct proximately caused a collision involving a bus parked on the highway shoulder. Although the driver failed to deploy reflective warning triangles as required by FMCSR § 392.22, the Court held this regulatory violation did not establish causation. The evidence showed the third-party driver was intoxicated and asleep at the wheel when he left the roadway and struck the bus, breaking the causal chain. Because the bus was not obstructing traffic and other vehicles passed safely, the Court concluded defendants merely furnished a condition rather than a substantial factor in the crash. All negligence, gross negligence, and punitive damages claims were dismissed.

Florida / Middle District
Court allows broker's contractual indemnity claim to proceed while dismissing unlawful brokerage allegations.

Landstar Blue, LLC v. Perfect 1, LLC, 2025 U.S. Dist. LEXIS 251006 (M.D. Fla. Dec. 5, 2025)
The Court denied dismissal of Landstar's breach of contract claim against motor carrier Gozal, holding that contractual indemnity obligations between a broker and carrier are not preempted by the Carmack Amendment. Landstar alleged it paid over $113,000 for cargo damage after Perfect subcontracted the shipment to Gozal, and neither carrier indemnified Landstar as required under their agreements. The Court found the brokerage contracts governed the parties' ongoing relationship—distinct from any bill of lading—and therefore fell outside Carmack's preemptive scope. However, the Court dismissed Landstar's unlawful brokerage claim under MAP-21, concluding the complaint failed to plausibly allege that Perfect acted as a broker rather than a motor carrier.

New York / Supreme Court (New York County)
Court grants summary judgment for railroad, dismissing FELA and statutory claims arising from highway crash.

Small v. Metro-N. Commuter Rail Rd. Co., 2025 N.Y. Misc. LEXIS 8947 (Sup. Ct. N.Y. Cnty. Nov. 6, 2025)
The Court granted summary judgment in favor of Metro-North and the MTA, dismissing all claims brought under FELA and related federal statutes after a Metro-North vacuum truck crashed on an interstate highway. The Court held that the Locomotive Inspection Act, Safety Appliance Act, and related federal regulations apply only to locomotives or on-track equipment and were inapplicable to a highway vehicle. The Court further found no triable issue of negligence under FELA, concluding that objective evidence—including maintenance records, dash-camera footage, and expert analysis—showed the vehicle was mechanically sound and that driver inattention, not fatigue or mechanical defect, caused the collision. Plaintiff's reliance on FMCSA hours-of-service regulations was rejected as inapplicable to railroad operations.