



# CASE SUMMARIES

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**Texas / Southern District**  
**Court recommends summary judgment for trailer owner, rejecting negligent entrustment and direct-liability claims.**

**Navarrete v. TA Dedicated, Inc.**, 2026 U.S. Dist. LEXIS 53062 (S.D. Tex. Jan. 30, 2026)  
The Court recommended granting summary judgment in favor of TA Dedicated, the trailer owner, in a trucking accident case arising from a stop-sign collision. Plaintiff asserted claims for negligent entrustment, hiring, training, and respondeat superior against TA. The Court found no evidence that TA employed or controlled the driver, who was hired and supervised by motor carrier CFI, and held that liability turns on the right to control, not mere ownership of the trailer. It further rejected the negligent entrustment claim, concluding TA entrusted the trailer to CFI, not the driver, and had no duty to independently vet CFI's drivers. Because the trailer itself did not contribute to the accident, all claims against TA were dismissed.

**Maryland / District of Maryland**  
**Court grants in part summary judgment in multi-defendant trucking case, narrowing negligent hiring and related claims.**

**Yoder v. Conaway Racing & Trucking, LLC**, 2026 U.S. Dist. LEXIS 53130 (D. Md. Mar. 16, 2026)  
The Court granted in part and denied in part defendants' motion for partial summary judgment arising from a highway collision caused when cattle escaped from a burning tractor-trailer and entered Interstate 40. Although Flatfoot admitted the driver was acting within the scope of employment, the Court held plaintiffs could pursue direct negligence claims based on evidence suggesting possible failures in inspection and maintenance, including testimony that a brake or bearing failure caused the trailer fire. The Court rejected plaintiffs' reliance on alleged hiring and drug-testing deficiencies as unrelated to the accident and therefore insufficient to bypass the Elrod doctrine. Punitive damages were dismissed, as the record contained no clear and convincing evidence of reckless or malicious conduct.

**New Jersey / District of New Jersey**  
**Court reinstates declaratory judgment action addressing coverage obligations in underlying trucking accident litigation.**

**Drive N.J. Ins. Co. v. Conaway Racing & Trucking, LLC**, 2026 U.S. Dist. LEXIS 53412 (D.N.J. Mar. 16, 2026)  
The Court granted the insurer's motion to reinstate a declaratory judgment action seeking to determine coverage obligations arising from a tractor-trailer accident. The insurer alleges the involved tractor and trailer were not scheduled on the policy at the time of the collision and therefore fall outside coverage, despite being added shortly after the incident without retroactive effect. The action also raises issues regarding the applicability of the MCS-90 endorsement, with the insurer arguing it is not triggered because the shipment involved purely intrastate transportation of non-hazardous goods. The Court found the matter appropriate to proceed, allowing resolution of key coverage and indemnity issues tied to the underlying liability case.