Ricci Tyrrell Johnson & Grey
ATTORNEYS AT LAW

QUARTERLY NEWSLETTER
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In This Issue:

News and Events

John M. Borelli
Member

Ricci Tyrrell welcomes **John M. Borelli** as a Member of the Firm. Mr. Borelli has extensive experience representing product manufacturers and distributors, property owners, retail businesses, construction companies and education institutions in liability suits. He also practices employment law and commercial litigation.

Julio Navarro
Associate

The Firm also welcomes **Julio Navarro** as an associate. Mr. Navarro has over a decade of experience as a defense litigator and also practices Immigration Law.

John E. Tyrrell
Managing Member

Michael Rosenthal
Assoiciate

Managing Member **John Tyrrell** and associate **Michael Rosenthal** authored an article in the **July-August 2023** volume of **Sports Facilities and the Law**. You can access that article **here**.

Gabrielle Outlaw
Associate

Associate **Gabrielle Outlaw** has been selected to serve as President of NovUs, the Villanova Law Young Alumni Association. The organization serves the needs of 2L and 3L students and recent graduates by hosting a variety of events.

Nicholas Sulpizio
Associate

Nicholas Sulpizio was part of a panel discussing Autonomous Vehicle Liability at a CLE event in July. Mr. Sulpizio is a RTJG associate

DEFENSE VERDICT FOR GENIE INDUSTRIES IN PHILADELPHIA COUNTY

RTJG client Genie Industries, Inc. secured a defense verdict in its favor in a products liability action tried before a jury in Philadelphia County in October 2023.

Plaintiff Michael Blake was elevated on a Genie scissor lift when the cinderblock wall he was demolishing collapsed and fell into the lift. Blake was hired by co-defendants Rusden Properties and Mark Rusden to demolish an interior 20-foot cinderblock wall at a construction and remodeling project. Blake made a specific rental request to Home Depot for the rental of a 20-foot scissor lift, which Blake also needed to fit through standard doorways of the building. The product at issue in this action was the Genie AWP-Vertically Elevating Work Platform, Slab Scissor Lift, Model GS-1930, designed by Genie and manufactured in 2018.

The theory against Genie was the subject lift was defective because it did not come equipped with outriggers. Defense counsel was able to demonstrate, however, that the proposed design change was not necessary to make the lift safe and would not have prevented this accident. The verdict was in favor of Genie in all respects. Plaintiff secured a verdict in his favor against the Rusden defendants.

The Blake case was tried by RTJG Founding **Member Francis Grey** and **Member Rebecca Leonard.**

Fran Grey
Member

Rebecca Leonard
Member

RTJG SECURES DOUBLE-SUMMARY JUDGMENT VICTORY

RTJG won two (2) summary judgment motions in the Gangi v King's Court et al matter in Bergen County, NJ; one substantive and one for coverage from the co-defendant's insurer.

The Firm represented Carla Development Corp., owner of a building which housed two gym facilities, one called King's Court Health Club and the other called Empire Sports and Fitness. King's gave up its racquetball courts and Empire expanded its lease with Carla to include those courts. Carla removed the walls between the courts, and Empire agreed upon taking possession to turn those courts into a basketball court. It hired defendant Rob's Maintenance to replace the floorboards where the walls once stood, and paint the courts.

Empire took possession and had the work completed by Rob's in early February 2021. Carla had no role in the work, approving the plans, etc. The lease placed maintenance and repair responsibility on Empire. The lease also required Empire to indemnify Carla (but NOT for its own negligence), and to insure Carla and have it named as an additional insured.

After the floor work, Empire began renting the space for basketball games. On February 15, 2021, Plaintiff Gangi was part of a group that rented the basketball court. While playing he tore his Achilles tendon. Gangi filed suit, alleging that the condition of the floor caused his injury.

At the close of discovery, Carla moved for summary judgment on substance as a landlord out of possession. Plaintiff disputed the motion, arguing that prior work removing the walls created potential liability. The Judge agreed with Carla's position, finding Carla had completely turned possession and control over to Empire, who took it as they received it, and Empire's (Rob's) work was not attributable to Carla.

On coverage, the Court found coverage under the insured contract provision of the Empire policy with its insurer. Since Carla was now determined NOT to be negligent, the provision was applicable. Carla was awarded judgment and all costs and fees through the time of the motion.

Patrick J. McStravick
Member

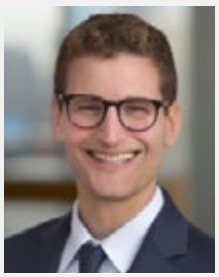
Kelly Woy
Associate

Jackie Zoller
Member

Kim M. Collins
Associate

Ricci Tyrrell's efforts in the Gangi matter were directed by Member **Patrick McStravick**. Associate **Kelly Woy** took a lead role and Member **Jackie Zoller** and associate **Kim Collins** contributed to the great result for the Firm's client.

GEARING UP FOR WINTER: A QUICK STATE SURVEY OF THE ON-GOING STORM RULE



Michael Rosenthal is an Associate at **Ricci Tyrrell Johnson & Grey**

When it rains it pours. This adage takes on a new dimension as property owners/operators gear up for the upcoming winter months in New Jersey, Pennsylvania and New York. But before these icy winds sweep across the tri-state area, this article embarks on a survey, delving into the nuances of how these states navigate torrents of liability stemming from inclement weather.

Before we begin, it helps to start with a few basics. Generally speaking, the ongoing storm rule acknowledges that property owners are not automatically liable for accidents caused by hazardous conditions arising from ongoing storms. Instead, the rule holds that during an ongoing storm, property owners are not expected to maintain their premises to the same standard as during fair weather conditions. While it is not an absolute bar to a plaintiff's slip and fall lawsuit, it nevertheless creates an extra barrier for a plaintiff to overcome to establish their case.

Pennsylvania

Under Pennsylvania's Hills and Ridges Doctrine, where generally slippery conditions exit, a plaintiff must prove: (1) that snow and ice had accumulated in ridges and elevations of such size and character as to unreasonably obstruct travel and constitute a danger to pedestrians; (2) that the property owner had notice, either actual or constructive, of the existence of such conditions; and (3) that it was the dangerous accumulation of snow and ice that caused the plaintiff to fall. Spruill v. Dreher Ave. Holdings, 2023 Pa. Dist. & Cnty. Dec. LEXIS 79, at *3 (C.P. Apr. 17, 2023) citing Collins v. Philadelphia Suburban Dev. Corp., 179 A.3d 69 (Pa. Super. Ct. 2018). Regarding snow and ice on a walkway, it is an impossible burden to require that walkways always be free and clear of ice and snow. The issue is whether or not defendants acted reasonably under the circumstances. Wentz v. Pennswood Apartments, 518 A.2d 314 (Pa. Super. 1986)

New York

Within the five boroughs of New York City, the New York City Administrative Code Sec. 16-123 codifies the ongoing storm rule setting forth duties owed by property owners to remove snow, ice and dirt from their sidewalk. When the incident occurs outside the five boroughs, local ordinances should be considered. Within the Big Apple, Section 16-123(a) states that persons who own property abutting a street or sidewalk have four hours from the time snow or rain stop precipitating to remove the snow, ice or dirt from the subject sidewalk. It is important to note that this four-hour grace period does not run between the hours of 9:00 p.m. and 7:00 a.m.
The New York Supreme Court of New York County recently confirmed that landowners have four hours from the time a snowstorm ceases to remove snow and ice from an abutting sidewalk in Rodriguez v. N.Y.C. Hous. Auth., 2022 N.Y. Misc. LEXIS 1764* (Sup. Ct. 2022). In Rodriguez, plaintiff slipped and fell at 8:20 in the morning. The defendants submitted weather data indicating snow fell between 2:00 a.m. and 10:00 a.m. on the day of the incident. Id. at *2. The Court granted the defendants' motion for summary judgment holding the defendants had at least until 11:00 a.m. to complete the snow removal before liability could be imposed. Id. at *4-5.

New Jersey

New Jersey joined its neghbors in formally adoping the ongoing storm rule in Pareja v. Princeton Int'l Prop., LLC, 252 A.3d 184 (N.J. 2021).

The court held that there are two exceptions that could impose a duty under this rule: (1) if the property owner's conduct increases the risk of injury, or (2) if there is a danger that pre-exists the storm. Due to its novelty, plaintiffs have taken the opportunity to argue that the ruling is limited to "commercial landowners" and therefore can still bring suit against property maintenance services, such as snow-removal contractors. However, recent Appellate Division rulings in Hanna v. Woodland Community Association, 2022 WL 16984707 (N.J. Super. Ct. App. Div. Nov. 17, 2022) and Sarro v. Artic Management, LLC, et al., 2023 WL 2566062 (N.J. Super. Ct. App. Div. March 20, 2023) have interpreted this rule to immunize snow and ice removal contractors from negligence. Hanna, Sarro and Pareja all involve analogous fact scenarios, in which the plaintiffs all fell during an on-going storm. In Sarro, the Appellate Division held in dicta: "The court in Pareja recognized removing snow during an ongoing storm is an 'impossible burden' and 'categorically inexpedient and impractical.' Imposing a requirement on a contractor to remove accumulated ice and snow would likewise be 'unreasonable.' Moreover, it would impose a legal duty impossible to satisfy." Thus, New Jersey commercial landowners and their snow-removal contractors can use these authorities to support an ongoing storm defense.

Takeaways

Overall, the rule translates to a higher threshold for establishing negligence on the part of property owners in instances where accidents occur due to the storm's impact. There are important takeaways that apply generally across these jurisdictions that property owners should consider. First, they should examine statutes relevant to the municipality in which the accident occurred to see whether there are local rules that apply. Second, if pulled into litigation, property owners should obtain a certified weather report or weather expert report for the day of and the day before the subject incident. Likewise, it would be strategic to tailor deposition questions to emphasize the exact weather conditions and temperature at the time of the accident and develop testimony about the plaintiff's perception of their surroundings. In the event that a plaintiff testifies it was "storming" or "chaos" at the time of their incident, that testimony may be used to attempt supporting dipositive motions, such as a motion for summary judgment. testimony may be used to attempt supporting dipositive motions, such as a motion for summary judgment.

ANALYZING APPLICATION OF THE NEW JERSEY PRODUCTS LIABILITY ACT AND CLASS ACTION LAWSUITS IN NEW JERSEY COURTS

Gabrielle A. Outlaw is an Associate at **Ricci Tyrrell Johnson & Grey**

The New Jersey Products Liability Act ("NJPLA") enables strict liability against a product manufacturer or seller when a plaintiff can prove that the subject product caused harm because it was unsuitable or unsafe for its intended use. N.J.S.A. 2A:58 C-2. In the matter, Gould v. Guida-Seibert Dairy Co., 2023 U.S. Dist. LEXIS 29137 (D.N.J. Feb. 2023), the United States District Court for the District of New Jersey analyzed the NJPLA, punitive damages and class action allegations under a unique set of facts.

Background:

In Gould, plaintiffs, who were parents of affected minor children, filed a complaint alleging negligence, NJPLA, and negligent infliction of emotional distress after their children became injured after drinking contaminated milk. According to the complaint, defendant Guida-Seibert Dairy Co. was contracted to provide milk in the Camden School District. The milk, which was contaminated by a commercial cleaning agent, was delivered to the schools and consumed by the students. The affected children were treated at the local hospital and released, but concerns remained as to the long-term effects of the exposure.

Plaintiffs' complaint contained allegations from two classes: the children and the parents (or legal guardians). They argued that the subject product had a manufacturing defect. Defendant filed a Motion to Dismiss and Motion to Strike.

Arguments:

Dismissal of Negligence Claims

Defendant filed a Rule 12(b)(6) Motion to Dismiss the allegations for negligence and negligent infliction of emotional distress. It argued the NJPLA subsumes other claims in a products liability lawsuit. The District Court stated that under New Jersey law, a product liability action is "any claim or action brought by a claimant for harm caused by a product, irrespective of the theory underlying the claim". N.J.S.A. 2A:58C-1(b)(3). One of the injuries under the NJPLA that is considered harm from a product is personal physical illness, injury or death. N.J.S.A. 2A:58C-1(b)(2)(b). Thus, under this provision, the NJPLA is the exclusive remedy for any injury claimed under a products liability framework. For this reason, Plaintiffs' claims for negligence and negligent infliction of emotional distress were subsumed by the NJPLA and these allegations were dismissed.

Dismissal of NJPLA Claims for Parents

Relatedly, defendant also argued that the NJPLA claim brought by the parents as individuals should be dismissed since the parents did not suffer physical injury from the product. The New Jersey Supreme Court has previously held that an NJPLA claim required physical injury. Thus, the District Court decided that the parents had not sufficiently plead a NJPLA claim for themselves as individuals and must only proceed on behalf of their children.

Dismissal of Punitive Damages

Plaintiffs made a request for punitive damages in their complaint. Defendant argued that plaintiffs did not plead the requisite level of culpability in their complaint for an award of punitive damages to be justified. Plaintiffs counterargued that it was reasonable to believe that at least one individual from the defendant company knew the milk was contaminated and recklessly shipped the product anyway. The Court agreed with defendant that plaintiffs' complaint did not plead allegations of acts or omissions beyond the level of general negligence. Thus, the request for punitive damages was dismissed.

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Motion to Strike Class Action

In addition to its Motion to Dismiss, Defendant also moved to strike Plaintiffs' pleading as a class action. Plaintiffs pled two classes: the parents (or legal guardians) and the children. They initially argued that their classes had numerosity because hundreds to thousands of children could have been affected. However, they later corrected that they believed the number of affected children to be at or under one hundred. Plaintiffs argued that they are typical of the class because they are all parents of children who drank the milk and all the children involved drank the milk. Lastly, the plaintiffs argued that filing a class action suit was a more efficient way to adjudicate the claims to avoid costly duplication.

In considering predominance and superiority of the class, defendant argued that plaintiffs' claims required individual analysis of the exposure, pre-existing conditions, and other relevant factors of the individual children. However, the District Court decided that striking the class at this stage without the parties conducting discovery would be premature.

Defendant further argued that the class definition for the qualified students was "fail-safe". A fail-safe class is one in which "whether a person qualifies as a member [of the class] depends on whether the person has a valid claim". See Landy v. Nat. Power Sources LLC, No. 21-00425, 2022 U.S. Dist. LEXIS 46534, 2022 WL 797967, at *4 (D.N.J. Mar. 16, 2022)(citation omitted).

It runs the risk of a claimant who does not fall within the class to not be bound by the final judgment. Thus, the Court may give the plaintiffs an opportunity to amend the complaint to adjust the class definition. Other Courts have left the analysis of a potential fail-safe class until the class certification stage as opposed to with a Motion to Strike. Thus, the District Court found it premature to decide at this point and stated defendant could revisit the issue at the time of class certification.

Lastly, defendant argued that the class allegation should be stricken based on the Rules Enabling Act because New Jersey law conflicted with Federal Rule of Civil Procedure 17(c). Defendant argued a discrepancy between the two regarding a guardian bringing suit on behalf of a minor child. Nevertheless, the Court rejected the argument pointing out that Defendant had mischaracterized the New Jersey rule.

Thus, the defendant's Partial Motion to Dismiss was granted and Motion to Strike was denied. The New Jersey Products Liability Act claim brought on behalf of the children was the only claim to remain.

Overall, this matter provides a roadmap for defendant corporations sued in New Jersey for products liability matters on how to seek dismissal of negligence claims that are subsumed under the NJPLA. Further, it provides clarity as to the Court's position on arguments to strike a class early in the litigation.

MCLAUGHLIN V. NAHATA: SMUDGING THE "BRIGHT LINE" BETWEEN INDEMNITY AND CONTRIBUTION

Kim M. Collins is an Associate at **Ricci Tyrrell Johnson & Grey**

The familiar adage, "hard cases make bad law," is an acknowledgment (or admonition) that applying the law to a particular set of facts in a particular context can have unintended consequence to a whole body of law.

On the other hand, simple facts make for easy application of bright line rules, but in real life-and real-life litigation, various complex issues arise which call into question how well-established law can be applied fairly and evenly. The Pennsylvania Supreme Court's decision in *McLaughlin v. Nahata*, 298 A.3d 384 (Pa. 2023) illustrates how courts grapple with reconciling the aims of the doctrines of contribution and indemnity with their theoretical and/or functional limitations.

Briefly, in *McLaughlin*, a medical malpractice case, the plaintiffs sued the hospital ("Hospital") and several healthcare providers for negligent care. One doctor-defendant joined the actual employer of two-codefendant physicians, a clinic ("Clinic"). The two co-defendant doctors held staff privileges at Hospital but were employed by Clinic. Hospital, then, filed a crossclaim against Clinic, seeking indemnity and contribution, on the basis that Hospital may be liable to pay for the negligence of Clinic's employees, i.e., the two co-defendant doctors. The heart of the issue addressed is: if Hospital is found to be vicariously liable for the two doctors (who are essentially independent contractors), what if anything is Hospital entitled to seek from the doctors' actual employer?

Both the trial court and the Superior Court concluded Hospital should be afforded an opportunity to seek contribution and/or indemnity, dependent upon further fact finding. The Supreme Court affirmed and held that where two entities are vicariously liable for the acts of a common agent, the law permits one entity found liable to seek contribution from the other. However, the six-justice Court was evenly divided as to whether a right to indemnity exists under the same paradigm, i.e. between two vicariously or secondarily liable parties. *McLaughlin*, 298 A.3d at 387.

Contribution: Fault-Sharing

In Pennsylvania, the right of contribution exists among joint tortfeasors. 42 Pa.C.S. § 8324. A joint tortfeasor may pursue the right if he has, by payment, discharged the common liability or has paid more than his pro rata share. *Id.* This right is codified in the Uniform Contribution Among Tort-feasors Act.

Under the Act, the term "joint tort-feasors" "means two or more persons jointly or severally liable in tort for the same injury to persons or property, whether or not judgment has been recovered against all or some of them." 42 Pa. C.S. § 8322.

The doctrine of contribution is based in equity-on the premise that "it would be unfair to impose the financial burden of the plaintiff's loss on one tortfeasor to the exclusion of" another where the first tortfeasor has paid "in excess of his or her share of liability" but the second contributed to plaintiff's loss. *Straw v. Fair*, 187 A3d 966, 1002 (Pa. Super. 2018). Thus, it is a mechanism by which fault is shared among tortfeasors where there is a common liability for the plaintiff's injury. *Walton v. Avco Corp.*, 610 A.2d 454, 460 (Pa. 1992).

Indemnity: Fault-Shifting

The common law remedy of indemnification is conceptually different than contribution in that it is not intended to "share" the fault- it is intended to shift the fault. It is available when a defendant is liable to a plaintiff only by operation of law and had no part in causing the injury. *Walton*, 610 A.2d at 460. Therefore, it "shifts the entire loss from one tortfeasor who has been compelled to pay it to the shoulders another who should bear it." Id. (*quoting* W. Prosser, Law of Torts at 310 (4th ed. 1979)).

It is a right which enures to a person who, without active fault on his own part, has been compelled, by reason of some legal obligation, to pay damages occasioned by the initial negligence of another and for which he himself is only secondarily liable. ... Secondary liability exists, for example, where there is a relation of employer and employee, or principal and agent.

Kemper Nat'l P & C Cos. v. Smith, 615 A.2d 372, 374-375 (Pa.1992)

***McLaughlin:* The line between Fault vs. Fair**

The aim of both contribution and indemnity is fairness. Contribution involves fairness among joint or concurrent tortfeasors. Indemnity fosters fairness with respect to a party who is liable to a plaintiff but who was without actual fault. *City of Wilkes-Barre v. Kaminski Bros.*, 804 A.2d 89, 92 (Pa. Cmwlth. 2002). It comes "into play when a defendant held liable by operation of law seeks to recover from a defendant whose conduct actually caused the loss." *Id.*

However simplistic seeming, "the landscape of [medical malpractice] claims and defendants can be very complex, given the potential involvement of multiple caregivers, an insurance scheme incorporating private and governmental elements, and oftentimes the high stakes attendant to claims of serious bodily injury or death." *Maloney v. Valley Med. Facilities, Inc.*, 984 A.2d 478, 485 (Pa. 2009).

In *McLaughlin*, the doctors were agents, as actual employees of Clinic and ostensible agents, as attending physicians at Hospital. It seems clear that Clinic would be vicariously liable to a plaintiff harmed by the doctors' treatment of her *while at the clinic*. Likewise, Hospital would be vicariously liable under the ostensible agency doctrine. These rules were crafted "to respond to a specific need in the law of torts: how to fully compensate an injury caused by the act of a single tortfeasor." *Milton S. Hershey Med. Ctr. v. Pa. Med. Prof'l Liab. Catastrophe Loss Fund*, 821 A.2d 1205, 1212 (Pa. 2003). The traditional mechanisms of fault shifting and sharing do not fit squarely into the *McLaughlin* setting, where Hospital seeks to base its right to contribution and indemnity on the theory that doctors were simultaneously agents of Clinic and Hospital. In this regard, there remains a need to address how and to what extent liability can be shared or shifted among "joint-secondarily liable" parties.

Key Points

The *McLaughlin* decision itself acknowledges that a number of disputed facts require resolution upon remand, which may clarify issues on which doctrines of liability apply. However, the decision provides a useful reminder that courts continue to explore-and expand on- how equitable doctrines are to be applied in complex corporate or healthcare settings. This may benefit a defendant facing a damages claim or create liability against a defendant who is now pursued under a once inapplicable theory. As the *McLaughlin* Court reminds: '"decisions are to be read against their facts to prevent the wooden application of abstract principles to circumstances in which different considerations may pertain.'" *McLaughlin*, 298 A.3d at 397 (quoting Maloney, 984 A.2d at 485-86; some formatting altered). Likewise, attorneys need to appreciate the evolving legal theories and envision how novel applications impact defense strategy. McLaughlin did not create a bright-line rule that two vicariously liable entities are always entitled to contribution or indemnity but it did create a grey zone ripe for pointed advocacy on the issues.

GETTING TO KNOW RTJG

DID YOU KNOW...

- Several members of the RTJG Team were college athletes including Members **John E. Tyrrell** (Columbia University Football); **Fran Grey** (Lehigh University Football); **Michael Droogan** (University of Pittsburgh Golf); **Patrick McStravick** (Trenton State Wrestling, Cross-Country and Track); Associates **Matt Cioeta** (Ursinus College Lacrosse and Soccer); **Jacob Kratt** (Rider University Soccer); **Nicholas Sulpizio** (University of Delaware Football) and **Kelly Woy** (University of Bucknell Lacrosse).

IN THE COMMUNITY

"In the Community" is edited by Ricci Tyrrell Member **Tracie Bock Medeiros**

- Ricci Tyrrell has donated to the **Philly Stands with Israel Fund** of the **Jewish Federation of Greater Philadelphia**. The fund is an emergency response campaign to provide immediate relief to the people of Israel in the wake of recent attacks by Hamas.
- Founding Member **Fran Grey** leads RTJG's strong relationship with **St. Joseph's Preparatory School (Prep)**. **Mr. Grey** and his sons **Fran**, **Jr.** and **Mack** all played football for Prep. RTJG has other Prep alumni including Members **Bill Ricci** and **Frank Burns,** associate **Matt Cioeta** and paralegals **Kristian Monsanto** and **John Osborne**.
- **RTJG's Community Justice Pro Bono** program will again partner with the **Carey School of Law at the University of Pennsylvania's** student-run **Fair Housing Rights Clinic.** RTJG lawyers help mentor teams of Penn law students as they prepare for hearings before the Fair Housing Commission. The Pro Bono Program is directed by Member **Nancy Green**.

On June 26th and 27th RTJG Member Mike Droogan and RTJG Associates **Nick Sulpizio** and **Matt Cioeta** participated in the 32nd Annual **Speedway Miracle Tournament** at **NCR Country Club** in Kettering, Ohio, benefiting **Children's Miracle** Network Hospitals (CMN Hospitals). Since 1991, the Speedway Miracle Tournament has served as the centerpiece of Speedway's fundraising efforts for CMN Hospitals and continues to be one of the largest charity golf tournaments in the nation. Funds raised to help CMN Hospitals advance pediatric healthcare by providing critical lifesaving equipment and much needed resources to help treat sick and injured children.

For its Summer fundraiser, RTJG participated in **Universal Missionary Baptist Church's** backpack and school supplies collection and donation for nearby neighborhood children. All donations were distributed on August 26, 2023, in preparation for back-to-school.