

SUPREME COURT OF IDAHO

Wilson v. J.R. Simplot Co.

143 Idaho 730 (2007) · Decided January 30, 2007

SUMMARY

Alan Wilson appealed an order granting J.R. Simplot Company a new trial on damages after a jury awarded Wilson \$250,000 in non-economic damages for injuries sustained in a vehicle collision. The Idaho Supreme Court affirmed, holding that the district court did not abuse its broad discretion in determining that the damages appeared to have been awarded under the influence of passion or prejudice.

CASE DETAILS

COURT	Supreme Court of Idaho
WRITING FOR THE COURT	Schroeder, Chief Justice; Trout, Justice; Burdick, Justice; Jones, Justice; Walters, Justice Pro Tem
JURISDICTION	Idaho
DECIDED	January 30, 2007
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an order granting the defendant's motion for a new trial on the ground that the jury's non-economic damages award was excessive and appeared to have been given under the influence of passion or prejudice.
STANDARD OF REVIEW	An order granting or denying a motion for a new trial is reviewed for manifest abuse of the trial court's wide discretion. When the motion is based on excessive damages, the trial court weighs the evidence and compares the jury's award with the amount it would have awarded without a jury; the verdict may be set aside when the disparity is so great that the award appears to have resulted from passion or prejudice.
PRECEDENTIAL VALUE	Published Idaho Supreme Court opinion
PARTIES	Alan W. Wilson v. J.R. Simplot Company

TOPICS

- motion for new trial
- damages
- personal injury
- appellate procedure
- standard of review

PRACTICE AREAS

torts

personal injury

damages

civil procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether the district court abused its discretion by granting a new trial because the jury's non-economic damages award was excessive and appeared to have been given under the influence of passion or prejudice.

HOLDINGS

1. The district court did not abuse its discretion in granting a new trial because the disparity between the jury's \$250,000 non-economic damages award and the trial court's assessment of a permissible award was sufficiently substantial to support the conclusion that the verdict appeared to have been given under the influence of passion or prejudice.

KEY QUOTATIONS

“Where a motion for a new trial is premised on inadequate or excessive damages, the trial court must weigh the evidence and then compare the jury’s award to what he would have given had there been no jury.” (143 Idaho at 731)

“The difference in this case is large enough that the district court could reasonably determine that the damages were so excessive that they appeared to have been given under the influence of passion or prejudice.” (143 Idaho at 732)

FACTUAL BACKGROUND

On July 16, 2003, a truck driven by a J.R. Simplot Company employee collided with Alan Wilson's pickup. Wilson suffered a forehead laceration and a compression fracture of his T12 vertebra, which had been previously fused with adjacent vertebrae after an earlier accident. The fracture healed by February 2004, although Wilson continued to report some pain, and his surgeon could not say that it would cause future medical problems. The jury awarded \$15,400 in economic damages and \$250,000 in non-economic damages.

PROCEDURAL HISTORY

After a motor-vehicle collision, J.R. Simplot Company admitted liability and the case proceeded to trial solely on damages. The jury awarded Wilson \$15,400 in economic damages and \$250,000 in non-economic damages. The district court denied judgment notwithstanding the verdict and remittitur but granted a new trial because the non-economic damages were excessive and appeared influenced by passion or prejudice. Wilson appealed, and the Idaho Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Dinneen v. Finch, 100 Idaho 620, 625-26, 603 P.2d 575, 580-81 (1979)
- Myers v. Workmen's Auto. Ins. Co., 140 Idaho 495, 506, 95 P.3d 977, 988 (2004)
- Quick v. Crane, 111 Idaho 759, 769-70, 727 P.2d 1187, 1197-98 (1986)

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