

OHIO COURT OF APPEALS, SIXTH APPELLATE DISTRICT, LUCAS COUNTY

Jefferson Capital Sys., L.L.C. v. McDuffey

2025-Ohio-5451 · No. L-25-00142 · Decided December 5, 2025

SUMMARY

The Ohio Sixth District Court of Appeals reversed a summary judgment entered for Jefferson Capital Systems, LLC in a debt-collection action against Joe McDuffey. The court held that McDuffey’s denial of responsibility, evidence that he had previously been mistaken for another person with the same name, and the loan documents’ limited identifying information created a genuine issue of material fact regarding the identity of the account holder. The case was remanded for trial.

CASE DETAILS

COURT	Ohio Court of Appeals, Sixth Appellate District, Lucas County
WRITING FOR THE COURT	Christine E. Mayle; Thomas J. Osowik; Myron C. Duhart
JURISDICTION	Ohio Court of Appeals, Sixth Appellate District, Lucas County
DECIDED	December 5, 2025
DOCKET	L-25-00142
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Accelerated appeal from the Toledo Municipal Court's grant of summary judgment to Jefferson Capital Systems, LLC in an action to collect an installment-loan debt.
STANDARD OF REVIEW	De novo review of summary judgment, using the same standard as the trial court.
PRECEDENTIAL VALUE	Published
PARTIES	Joe McDuffey v. Jefferson Capital Systems, LLC

TOPICS

- summary judgment
- standard of review
- civil procedure
- appellate procedure
- commercial litigation

PRACTICE AREAS

- civil procedure
- appellate procedure
- commercial litigation
- consumer protection

QUESTIONS PRESENTED

1. Whether the trial court erred in granting summary judgment when the evidence left a genuine issue of material fact regarding whether McDuffey was the person who held the loan account.
2. Whether the appellate court could consider McDuffey's evidentiary submission despite its not conforming to the forms generally contemplated by Civ.R. 56(C), where Jefferson Capital did not object.

HOLDINGS

1. Summary judgment is improper where the record, viewed in the nonmoving party's favor, contains a genuine issue of material fact regarding whether the defendant is the person identified in the loan documents as the account holder.
2. A court may consider evidence that does not conform to the forms generally contemplated by Civ.R. 56(C) when the opposing party does not object to its consideration.

KEY QUOTATIONS

“Given the lack of identifying information—other than the name “Joe McDuffey”—in the loan documents, we find that this is sufficient to raise a genuine issue of material fact regarding the identity of the loan-account holder.” (¶ 15)

“Because the issue of the account holder’s identity is in dispute, summary judgment is not appropriate.” (¶ 15)

FACTUAL BACKGROUND

Jefferson Capital sued to collect \$11,894.16 allegedly owed on an installment loan assigned to it. The loan and assignment documents identified an account in the name of Joe McDuffey, but contained little identifying information beyond the name, a partial Social Security number in the sale documents, and an address in Toledo. McDuffey denied obtaining the loan or receiving the money and asserted that multiple people named Joe McDuffey lived in Toledo. Jefferson Capital did not provide additional identifying information, such as a date of birth or full Social Security number, in support of its summary-judgment motion.

PROCEDURAL HISTORY

Jefferson Capital alleged that McDuffey owed \$11,894.16 on an installment loan and attached loan and assignment documents. McDuffey denied that the debt was his and asserted that multiple people named Joe McDuffey lived in Toledo. The Toledo Municipal Court granted Jefferson Capital's untimely motion for summary judgment, and McDuffey appealed. The Sixth District reversed and remanded for trial.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The June 5, 2025 decision of the Toledo Municipal Court is reversed, and the matter is remanded for trial. Jefferson Capital is ordered to pay the costs of the appeal.

CASES CITED

- State ex rel. Cassels v. Dayton City School Dist. Bd. of Edn., 69 Ohio St.3d 217, 223 (1994)
- Grafton v. Ohio Edison Co., 77 Ohio St.3d 102, 105 (1996)
- Lorain Natl. Bank v. Saratoga Apts., 61 Ohio App.3d 127, 129 (9th Dist. 1989)
- Harless v. Willis Day Warehousing Co., 54 Ohio St.2d 64, 66 (1978)
- Dresher v. Burt, 75 Ohio St.3d 280, 293 (1996)
- Mitseff v. Wheeler, 38 Ohio St.3d 112 (1988), syllabus
- Riley v. Montgomery, 11 Ohio St.3d 75, 79 (1984)
- Russell v. Interim Personnel, Inc., 135 Ohio App.3d 301, 304 (6th Dist. 1999)
- Needham v. Provident Bank, 110 Ohio App.3d 817, 827 (8th Dist. 1996)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Pollard v. Elber, 2018-Ohio-4538, ¶¶ 21-22 (6th Dist.)

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