

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Amina Hussain-Day v. Jesse L. Crain, et al.

Hussain-Day · No. 1:25-CV-00201 · Decided February 25, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania considered motions to dismiss claims arising from a fatal tractor-trailer accident. The court held that Hussain-Day’s claims against Total Quality Logistics were preempted by the Federal Aviation Administration Authorization Act to the extent TQL acted as a broker, but denied dismissal to the extent TQL may have acted as a carrier because that status required discovery. The court also denied Superstar Transport’s motion to dismiss punitive-damages claims based on allegations that the driver operated the tractor-trailer under the influence of narcotics.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Karoline Mehalchick
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	February 25, 2026
DOCKET	1:25-CV-00201
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff's third amended Pennsylvania tort complaint was challenged by motions to dismiss under Federal Rule of Civil Procedure 12(b)(6). The court considered TQL's FAAAAA preemption arguments and Superstar's challenges to punitive-damages and recklessness allegations.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court identifies the elements of the claims, disregards allegations that are merely conclusory, and determines whether the well-pleaded factual allegations plausibly satisfy the elements of the claims. The court accepts plausible factual allegations as true and construes reasonable inferences in the plaintiff's favor, while not assuming the truth of legal conclusions or facts not alleged.
PRECEDENTIAL VALUE	unpublished

PARTIES

Amina Hussain-Day v. Jesse L. Crain, Kevin Richardson, Wooden Goose Trucking, LLC, Total Quality Logistics, LLC, Superstar Transport, LLC

TOPICS

motions to dismiss

civil procedure

negligence

punitive damages

federalism

PRACTICE AREAS

civil procedure

trucking and transportation law

torts

preemption

damages

QUESTIONS PRESENTED

1. Whether the court could determine on a Rule 12(b)(6) motion, based on TQL's public regulatory filings, that TQL acted solely as a freight broker in connection with the accident.
2. Whether Hussain-Day's Pennsylvania negligence, negligent hiring, wrongful-death, survival, and broker-liability claims against TQL were preempted by the Federal Aviation Administration Authorization Act.
3. Whether the FAAAA safety exception could preserve negligence claims against TQL if TQL acted as a motor carrier rather than a broker.
4. Whether the complaint plausibly alleged conduct sufficient to support punitive damages against Superstar.
5. Whether the complaint's allegations of recklessness and willful or wanton conduct should be stricken or dismissed.
6. Whether Hussain-Day should receive leave to amend after filing three complaints.

HOLDINGS

1. Although the court could take judicial notice that TQL was registered with the Federal Motor Carrier Safety Administration as a broker, that registration did not establish that TQL acted solely as a broker in connection with Day's accident. The complaint's allegation that TQL may have acted as a carrier created a factual issue requiring discovery.
2. Hussain-Day's Pennsylvania negligence, negligent-hiring, related wrongful-death and survival claims, and broker-liability claims were preempted to the extent they alleged that TQL was liable as a broker. The court granted TQL's motion as to those claims and dismissed the broker-liability claims with prejudice.
3. The court denied TQL's motion without prejudice as to claims alleging that TQL acted as a carrier. Because the court could not determine at the pleading stage whether TQL acted as a broker or carrier in the accident, TQL could reassert preemption after discovery.
4. The complaint sufficiently stated punitive-damages claims against Superstar. Allegations that Crain drove a tractor-trailer while under the influence of narcotics and that Superstar recklessly entrusted him

with the vehicle were sufficient at the pleading stage, particularly because the punitive-damages inquiry is fact intensive.

5. The court denied leave to amend because Hussain-Day had already filed three complaints and had ample opportunity to correct any pleading deficiencies.

KEY QUOTATIONS

“However, the fact that TQL is registered as a broker before the FMCSA does not by itself mean that it should be considered a broker for purposes of the instant motion.” (Section III.A)

“Accordingly, negligent hiring and general negligence claims are barred against brokers and carriers unless an exception to the FAAAA’s preemption applies.” (Section III.B)

“Such allegations are sufficient to sustain a claim for punitive damages given the fact intensive nature of the inquiry and the general reluctance amongst courts to dismiss claims for punitive damages prior to discovery.” (Section III.C)

FACTUAL BACKGROUND

Christopher Day was operating a motorcycle in York, Pennsylvania on April 30, 2024, when a tractor-trailer driven by Jesse Crain entered his path and caused a crash resulting in Day's death. The complaint alleged that Crain was under the influence of narcotics and that Superstar, Wooden Goose, and Kevin Richardson owned, maintained, and/or controlled the truck. The complaint alleged that Total Quality Logistics either acted as a broker or carrier between other entities or controlled and maintained the truck involved in the accident.

PROCEDURAL HISTORY

Hussain-Day initiated the action on January 22, 2025, and filed a third amended complaint on April 23, 2025, asserting twenty-eight Pennsylvania tort-law counts arising from a fatal tractor-trailer and motorcycle collision. TQL and Superstar moved to dismiss. The Wooden Goose Defendants separately moved to dismiss, but their motion became moot after settlement and court approval of the settlement. The court granted TQL's motion in part, denied it in part, denied Superstar's motion, denied the Wooden Goose Defendants' motion as moot, dismissed the broker-liability claims against TQL with prejudice, and denied further leave to amend.

DISPOSITION

other

CASES CITED

- Burtch v. Milberg Factors, Inc., 662 F.3d 212, 221 (3d Cir. 2011)
- Tellabs, Inc. v. Makor Issues & Rights, Ltd., 551 U.S. 308, 322 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Morse v. Lower Merion Sch. Dist., 132 F.3d 902, 906 (3d Cir. 1997)

- In re Burlington Coat Factory Sec. Litig., 114 F.3d 1410, 1429-30 (3d Cir. 1997)
- Associated Gen. Contractors of Cal. v. Cal. State Council of Carpenters, 459 U.S. 519, 526 (1983)
- Palakovic v. Wetzel, 854 F.3d 209, 219-20 (3d Cir. 2017)
- Jordan v. Fox, Rothschild, O'Brien & Frankel, 20 F.3d 1250, 1261 (3d Cir. 1994)
- Schuchardt v. President of the U.S., 839 F.3d 336, 347 (3d Cir. 2016)
- Schmidt v. Skolas, 770 F.3d 241, 249 (3d Cir. 2014)
- Pension Ben. Guar. Corp. v. White Consol. Indus., Inc., 998 F.2d 1192, 1197 (3d Cir. 1993)
- Clark v. Governor of New Jersey, 53 F.4th 769, 774 (3d Cir. 2022)
- Furando v. Ortiz, No. CV 20-3739, 2020 WL 1922357, at *1 (D.N.J. Apr. 21, 2020)
- Hynoski v. Columbia Cnty. Redevelopment Auth., 941 F. Supp. 2d 547, 556 (M.D. Pa. 2013)
- Hall v. Johnson & Johnson, No. CV 18-1833, 2019 WL 7207491, at *10 (D.N.J. Dec. 27, 2019)
- Ciotola v. Star Transportation & Trucking, LLC, 481 F. Supp. 3d 375, 386-93 (M.D. Pa. 2020)
- Hartford Fire Ins. Co. v. Dynamic Worldwide Logistics, Inc., No. CV 17-553, 2017 WL 3868702, at *2
- CSX Transp., Inc. v. Easterwood, 507 U.S. 658, 663 (1993)
- Lupian v. Joseph Cory Holdings LLC, 905 F.3d 127, 130 (3d Cir. 2018)
- Rowe v. New Hampshire Motor Transp. Ass'n, 552 U.S. 364, 368, 370-73 (2008)
- Lee v. Golf Transportation, Inc., No. 3:21-CV-01948, 2023 WL 7329523, at *6-14 (M.D. Pa. Nov. 7, 2023)
- Bedoya v. Am. Eagle Express Inc., 914 F.3d 812, 819-24 (3d Cir. 2019)
- Dan's City Used Cars, Inc. v. Pelkey, 569 U.S. 251, 261 (2013)
- Ye v. GlobalTranz Enters., Inc., 74 F.4th 453, 457, 459-61 (7th Cir. 2023)
- Aspen Am. Ins. Co. v. Landstar Ranger, Inc., 65 F.4th 1261, 1268 (11th Cir. 2023)
- Miller v. C.H. Robinson Worldwide, Inc., 976 F.3d 1016, 1024 (9th Cir. 2020)
- Creagan v. Wal-Mart Transportation, LLC, 354 F. Supp. 3d 808, 814 (N.D. Ohio 2018)
- Hutchison ex rel. Hutchison v. Luddy, 582 Pa. 114, 120-24 (2005)
- Feld v. Merriam, 506 Pa. 383, 393 (1984)
- Kozak v. Klikuszewski, No. 4:21-CV-01609, 2022 WL 1177895, at *2 (M.D. Pa. Apr. 20, 2022)
- Dragone v. Pew, 621 F. Supp. 3d 561, 567 (E.D. Pa. 2022)
- Enari v. Davranov, No. 3:24-CV-01101, 2024 WL 4729758, at *3 (M.D. Pa. Nov. 8, 2024)
- Kerlin v. Howard, No. 4:18-CV-00481, 2018 WL 4051702, at *1-2 (M.D. Pa. Aug. 24, 2018)
- Grayson v. Mayview State Hosp., 293 F.3d 103, 108 (3d Cir. 2002)
- In re Avandia Mktg., Sales Practices & Products Liab. Litig., 564 F. App'x 672, 673 (3d Cir. 2014)
- Lake v. Arnold, 232 F.3d 360, 373 (3d Cir. 2000)
- Klein v. Autek Corp., 147 F. App'x 270, 278 (3d Cir. 2005)
- Gorman v. Bail, 947 F. Supp. 2d 509, 528 (E.D. Pa. 2013)

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