

LOUISIANA COURT OF APPEAL, FIRST CIRCUIT

Joel Colby Stevens v. Hospital Service District Number 1 of Tangipahoa Parish d/b/a North Oaks Health System and North Oaks Occupational Health

No. 2025 CA 0240 (La. Ct. App. 2025) · No. 2025 CA 0240 · Decided December 19, 2025

SUMMARY

The Louisiana First Circuit Court of Appeal reversed a summary judgment dismissing Joel Colby Stevens’s negligence and fraud claims against Hospital Service District Number 1 of Tangipahoa Parish, doing business as North Oaks Health System and North Oaks Occupational Health. The court held that issue preclusion did not apply because the prior federal aviation proceedings involved different issues and legal standards, and that the defendant’s motion did not adequately address the specific elements of Stevens’s claims as required for summary judgment. The court remanded by reversing the district court’s judgment and assessed appeal costs against the defendant.

CASE DETAILS

COURT	Louisiana Court of Appeal, First Circuit
WRITING FOR THE COURT	Edwards, J.; Miller, J.; Fields, J.
JURISDICTION	Louisiana Court of Appeal, First Circuit
DECIDED	December 19, 2025
DOCKET	2025 CA 0240
DISPOSITION	reversed
PROCEDURAL POSTURE	Plaintiff appealed a district-court judgment granting defendant's motion for summary judgment and dismissing his fraud and negligence claims with prejudice.
STANDARD OF REVIEW	Summary judgment is reviewed de novo under the same criteria governing the district court's determination of whether summary judgment is appropriate.
PRECEDENTIAL VALUE	Unknown
PARTIES	Joel Colby Stevens v. Hospital Service District Number 1 of Tangipahoa Parish d/b/a North Oaks Health System and North Oaks Occupational Health

TOPICS

summary judgment

res judicata

negligence

fraud

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the federal FAA and NTSB proceedings precluded Stevens's state-law negligence and fraud claims under collateral estoppel or res judicata.
2. Whether North Oaks was entitled to summary judgment based on the undisputed facts that Stevens failed to provide a sufficient specimen and left the clinic before the test was completed.
3. Whether summary judgment could be granted on negligence and fraud issues that North Oaks did not specifically identify and support in its motion.

HOLDINGS

1. The NTSB proceeding could not form the basis of res judicata or collateral estoppel because Stevens asserted that the ruling was on appeal and the record contained nothing refuting that assertion; under applicable federal law, the prior decision was not sufficiently final for issue-preclusion purposes.
2. Collateral estoppel did not bar Stevens's negligence and fraud claims because the FAA proceeding involved a different legal issue and was governed by a different standard of review than the state tort action.
3. Stevens's decision to leave the clinic before the test was completed did not, as a matter of law, relieve North Oaks of its duties or establish that North Oaks was entitled to summary judgment.
4. Summary judgment could not be granted on negligence and fraud issues that North Oaks did not specifically identify as lacking factual support in its motion.

KEY QUOTATIONS

“We can find no law or regulation that would relieve North Oaks of all liability to Stevens because he left the clinic prior to the expiration of the three hours afforded to him under the shy bladder procedures.” (at 12)

“A summary judgment decided on issues other than those raised by the parties is legally erroneous.” (at 13)

“Because North Oaks did not address the specific elements of Stevens' negligence and fraud claims that he will allegedly be unable to prove at trial, summary judgment may not be rendered or affirmed based on those issues” (at 13)

FACTUAL BACKGROUND

Stevens, a commercial helicopter pilot and flight instructor, was conditionally offered employment by Bristow subject to a Department of Transportation drug test. At North Oaks Occupational Health, Stevens made several attempts to provide a sufficient urine sample but left approximately one and a half hours after arriving, before

the test was completed. Bristow rescinded the employment offer, reported the incomplete test to the FAA, and the FAA later revoked Stevens's pilot license and medical certificate. Stevens alleged that North Oaks employees failed to follow the regulatory shy-bladder procedures and inaccurately reported or documented the events.

PROCEDURAL HISTORY

Stevens filed a damages action in the Twenty-First Judicial District Court alleging that North Oaks and its employees negligently administered a urine drug test and fraudulently misrepresented the events surrounding the collection. The district court overruled North Oaks's res judicata exception, later declined to grant summary judgment on issue-preclusion grounds, but granted summary judgment on the merits based primarily on the undisputed facts that Stevens did not provide a sufficient specimen and left before completion of the test. The First Circuit reversed, holding that issue preclusion did not apply and that summary judgment could not be granted on grounds not properly raised and supported in the motion.

DISPOSITION

reversed

REMAND INSTRUCTIONS

The judgment granting summary judgment to North Oaks and dismissing Stevens's petition with prejudice was reversed. The opinion does not state additional specific remand instructions.

CASES CITED

- Stevens v. Administrator, Federal Aviation Administration, 829 F. App'x 690 (5th Cir. 2020) (per curiam)
- Stevens v. Hospital Service District No. 1 of Tangipahoa Parish, 2022-0069 (La. App. 1 Cir. Apr. 25, 2022)
- Guidry v. USAgencies Casualty Insurance Company, Inc., 213 So. 3d 406, 414 (La. App. 1 Cir. 2017), writ denied, 221 So. 3d 81 (La. 2017)
- Jenkins v. Hernandez, 305 So. 3d 365, 370-71 (La. App. 1 Cir. 2020), writ denied, 303 So. 3d 315 (La. 2020)
- R.G. Claitor's Realty v. Juban, 391 So. 2d 394, 397 (La. 1980)
- Borja v. FARA, 218 So. 3d 1, 10 n.3 (La. 2016)
- Stewart v. City of Hammond, 322 So. 3d 1253, 1257-58 (La. App. 1 Cir. 2021)
- B & B Hardware, Inc. v. Hargis Industries, Inc., 575 U.S. 138, 147 (2015)
- Bradberry v. Jefferson County, Tex., 732 F.3d 540, 548-49 (5th Cir. 2013)
- Kariuki v. Tarango, 709 F.3d 495, 506 (5th Cir. 2013)
- Hacienda Records, L.P. v. Ramos, 718 F. App'x 223, 230 (5th Cir. 2018) (per curiam)
- Parklane Hosiery Co. v. Shore, 439 U.S. 322, 326 n.4 (1979)
- Copeland v. Merrill Lynch & Co., Inc., 47 F.3d 1415, 1422 (5th Cir. 1995)
- Dickson v. F.A.A., 480 F. App'x 263, 266 (5th Cir. 2012) (per curiam)
- Ellis v. Liberty Life Assurance Co. of Boston, 394 F.3d 262, 273 (5th Cir. 2005)
- Rainey v. Knight, 378 So. 3d 116, 122 (La. App. 1 Cir. 2023)

- *Guilbeau Marine, Inc. v. Ledet*, 375 So. 3d 977, 984 (La. App. 1 Cir. 2023), writ denied, 375 So. 3d 411 (La. 2023)
- *Troncoso v. Point Carr Homeowners Association*, 360 So. 3d 901, 916 (La. App. 1 Cir. 2023)

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