

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
KENTUCKY

Samuel Holmes v. Lexington-CJD, LLC d/b/a Freedom CDJR of
Lexington

Holmes · No. 5:23-CV-249-KKC · Decided January 22, 2026

SUMMARY

The United States District Court for the Eastern District of Kentucky denies Samuel Holmes’s motion for reconsideration of the court’s prior summary-judgment ruling on his fraud claim against Lexington-CJD, LLC. The court holds that Holmes did not identify a valid basis for relief under Federal Rule of Civil Procedure 59(e), and reiterates that Kentucky law recognizes a presumption of innocence and honesty in fraud cases. The court also concludes that Holmes failed to present evidence sufficient to meet the clear-and-convincing-evidence standard for fraud.

CASE DETAILS

COURT	United States District Court for the Eastern District of Kentucky
WRITING FOR THE COURT	Karen K. Caldwell
JURISDICTION	United States District Court for the Eastern District of Kentucky
DECIDED	January 22, 2026
DOCKET	5:23-CV-249-KKC
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Civil Procedure 59(e) for reconsideration of the court's prior order granting summary judgment to defendant on the fraud claim. The court denied the motion.
STANDARD OF REVIEW	A Rule 59(e) motion is an extraordinary remedy committed to the district court's discretion and is appropriate only for a clear error of law, newly discovered evidence, an intervening change in controlling law, or a need to prevent manifest injustice. Denial is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Unknown; unpublished district court opinion
PARTIES	Samuel Holmes v. Lexington-CJD, LLC d/b/a Freedom CDJR of Lexington

TOPICS

motion for reconsideration

summary judgment

fraud

commercial litigation

civil procedure

PRACTICE AREAS

civil procedure

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fraud

summary judgment

QUESTIONS PRESENTED

1. Whether Holmes established a basis under Federal Rule of Civil Procedure 59(e) to reconsider the prior grant of summary judgment on his fraud claim.
2. Whether Kentucky's presumption of innocence and honesty remains valid and applicable to Holmes's fraud claim at the summary-judgment stage.
3. Whether Holmes presented evidence that could satisfy Kentucky's clear-and-convincing standard for fraud and show intentional or reckless conduct.

HOLDINGS

1. A Rule 59(e) motion may be granted only upon a clear error of law, newly discovered evidence, an intervening change in controlling law, or a need to prevent manifest injustice; disagreement with the court's prior analysis or an attempt to advance arguments that could have been raised earlier is insufficient.
2. Kentucky's presumption of innocence and honesty in fraud cases remains valid and must be applied by a federal court applying Kentucky law.
3. Holmes failed to identify evidence that could satisfy Kentucky's clear-and-convincing standard or establish that Freedom acted intentionally or recklessly; therefore, the prior summary judgment ruling on the fraud claim was not subject to reconsideration.

KEY QUOTATIONS

“The purpose of Federal Rule of Civil Procedure 59(e) is to allow a district court to correct its own mistakes.” (Analysis)

“Granting a Rule 59(e) motion is an extraordinary remedy that lies in the court's discretion.” (Analysis)

“A motion under Rule 59(e) is not an opportunity to re-argue a case” (Analysis)

“Holmes’ criticisms of the presumption of innocence and honesty afford no basis for relief in this Court, and his disagreements with the Court’s evaluation of the evidence may not be relitigated through a motion for reconsideration.” (Conclusion)

FACTUAL BACKGROUND

Holmes alleged that Freedom engaged in fraud concerning erroneous mileage stated in a vehicle purchase packet and concealed or suppressed information about the vehicle's actual mileage. The court previously concluded that Holmes lacked sufficient evidence that Freedom acted intentionally or recklessly and that the evidence did not

satisfy Kentucky's clear-and-convincing standard. On reconsideration, Holmes challenged Kentucky's presumption of innocence and honesty and advanced additional reasons why Freedom's conduct allegedly was reckless.

PROCEDURAL HISTORY

Holmes asserted several claims, including fraud, against Freedom. Freedom moved for summary judgment, and on October 23, 2025, the court granted summary judgment to Freedom on the fraud count. Holmes timely moved for reconsideration, arguing that the court improperly applied Kentucky's presumption of innocence and honesty. The court denied reconsideration because Holmes identified no Rule 59(e) ground and sought only to relitigate the prior merits determination.

DISPOSITION

other

CASES CITED

- Waid v. Snyder, No. 18-1960, 2019 U.S. App. LEXIS 4839, at *1 (6th Cir. Feb. 19, 2019)
- Moody v. Pepsi-Cola Metro. Bottling Co., 915 F.2d 201, 206 (6th Cir. 1990)
- White v. New Hampshire Dep't of Emp't Sec., 455 U.S. 445, 450 (1982)
- Betts v. Costco Wholesale Corp., 558 F.3d 461, 474 (6th Cir. 2009)
- Henderson v. Walled Lake Consol. Sch., 469 F.3d 479, 496 (6th Cir. 2006)
- Huff v. Metro. Life Ins. Co., 675 F.2d 119, 122 (6th Cir. 1982)
- Goerter v. Shapiro, 72 S.W.2d 444, 445-46 (Ky. 1934)
- Helm Co., LLC v. Al J. Schneider Co., Nos. 2013-CA-001192-MR, 2013-CA-001385-MR, 2014 Ky. App. Unpub. LEXIS 768, at *10 (Ky. Ct. App. Sept. 26, 2014)
- Pac. Mut. Life Ins. Co. v. Arnold, 90 S.W.2d 44, 49 (Ky. 1935)
- T.M. Crutcher Lab. v. Crutcher, 157 S.W.2d 314, 320 (Ky. 1941)
- Compressed Gas Corp. v. United States Steel Corp., 857 F.2d 346 (6th Cir. 1988)
- First Tech. Capital, Inc. v. JP Morgan Chase Bank, N.A., No. 12-289-KSF, 2013 U.S. Dist. LEXIS 36391, at *19 (E.D. Ky. Mar. 15, 2013)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- United Parcel Service Co. v. Rickert, 996 S.W.2d 464, 468 (Ky. 1999)
- Morton v. Tipton, No. 2017-CA-001305-ME, 2018 Ky. App. LEXIS 190, at *10 (Ky. Ct. App. June 22, 2018)
- White v. Turfway Park Racing Ass'n, 909 F.2d 941, 944 (6th Cir. 1990)
- Sault Ste. Marie Tribe of Chippewa Indians v. Engler, 146 F.3d 367, 374 (6th Cir. 1998)

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