

SUPREME COURT OF MISSISSIPPI

**Rig Masters, Inc. v. Katie Colenberg, Individually and on Behalf of
the Heirs and Wrongful-Death Beneficiaries of Isaac Pearl Colenberg
(Deceased) and Thomas A. Sturdivant**

No. 2024-IA-00506-SCT · No. No. 2024-IA-00506-SCT · Decided June 11, 2026

SUMMARY

The Mississippi Supreme Court reviewed an interlocutory appeal from the denial of summary judgment on a negligent-entrustment claim arising from a fatal automobile accident. The Court held that the plaintiff failed to present sufficient evidence that Rig Masters knew or should have known of the driver's alleged substance-abuse problem, retained control of the truck, or that the alleged substance abuse directly correlated with the accident, and therefore reversed and remanded.

CASE DETAILS

COURT	Supreme Court of Mississippi
WRITING FOR THE COURT	Ishee, J.; Randolph, C.J.; King, P.J.; Coleman, P.J.; Griffis, J.; Sullivan, J.; Branning, J.
JURISDICTION	Supreme Court of Mississippi
DECIDED	June 11, 2026
DOCKET	No. 2024-IA-00506-SCT
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Interlocutory appeal from the denial of summary judgment on a wrongful-death plaintiff's negligent-entrustment claim.
STANDARD OF REVIEW	Denial of summary judgment is reviewed de novo, with the evidence viewed in the light most favorable to the nonmoving party. The moving party bears the burden of showing that no genuine issue of material fact exists; the nonmoving party must identify specific facts showing a genuine issue for trial.
PRECEDENTIAL VALUE	published
PARTIES	Rig Masters, Inc. v. Katie Colenberg, individually and on behalf of the heirs and wrongful-death beneficiaries of Isaac Pearl Colenberg (deceased)

TOPICS

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QUESTIONS PRESENTED

1. Whether the circuit court erred by denying Rig Masters summary judgment on the negligent-entrustment claim.
2. Whether the evidence established genuine issues of material fact concerning Rig Masters' knowledge of Sturdivant's alleged substance-abuse problem, control of the truck, and a direct correlation between the alleged substance abuse and the accident.
3. Whether Rig Masters could be liable for negligent entrustment merely because title and insurance remained in its name after Sturdivant purchased the truck.

HOLDINGS

1. A prima facie negligent-entrustment claim requires proof that the defendant supplied a chattel to a third party; knew or should have known that the third party would use it in a manner involving an unreasonable risk of harm; harm resulted from the use; the chattel was under the supplier's control; and the supplier's known or knowable dangerous conduct had a direct correlation to the harm.
2. The evidence was insufficient to show that Rig Masters knew or should have known, when it sold the truck, that Sturdivant had a substance-abuse problem making him an unreasonable hazard to other drivers.
3. Rig Masters did not retain the control required for negligent-entrustment liability merely because title and insurance remained in its name.
4. The negligent-entrustment claim failed because no evidence showed that Sturdivant was under the influence of drugs or alcohol at the time of the accident or that alleged substance abuse contributed to the collision.

KEY QUOTATIONS

“The paramount requirement for liability under the theory of negligent entrustment is whether or not defendant had a right to control the vehicle.” (§ 23)

“Further, this Court finds additional requirements: (4) that the chattel was under the control of the supplier, Sligh, 735 So. 2d at 969, and (5) “the conduct of which the supplier of the [chattel] was or should have been aware had a direct correlation to the cause of the [harm].”” (§ 24)

“Sturdivant did not require Rig Masters’ consent to use the truck; therefore, Rig Masters could not prevent him from using the truck by withholding consent.” (§ 36)

“Thus, this Court reverses the circuit court decision and remands the case to the circuit court to render summary judgment in favor of Rig Masters on the claim of negligent entrustment.” (¶ 38)

FACTUAL BACKGROUND

Rig Masters hired Thomas Sturdivant as a diesel mechanic while he was living at a rehabilitation center. Sturdivant purchased a truck from Rig Masters through payroll deductions, paid the remaining balance on September 6, 2022, and received a notarized title when he was fired. Although the title and insurance remained in Rig Masters' name when Sturdivant had not registered the vehicle, he possessed the truck and title and was responsible for transferring title. On October 4, 2022, Sturdivant collided with another vehicle, killing Isaac Colenberg; the accident report did not indicate suspected drug or alcohol use.

PROCEDURAL HISTORY

Katie Colenberg sued Rig Masters and Thomas Sturdivant after a collision in which Isaac Colenberg died, asserting negligence, wrongful death, and liability theories including negligent entrustment and respondeat superior. The circuit court set aside an entry of default against Rig Masters, later granted summary judgment on the respondeat-superior claim because Sturdivant was no longer employed by Rig Masters at the time of the accident, but denied summary judgment on negligent entrustment. The Supreme Court of Mississippi granted Rig Masters' petition for interlocutory appeal and reversed the denial of summary judgment.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The circuit court was directed to render summary judgment in favor of Rig Masters on the negligent-entrustment claim.

CASES CITED

- Lakeland Premier Women's Clinic, PLLC v. Jackson, 426 So. 3d 1062, 1065 (Miss. 2025)
- United Emergency Servs. of Miss., Inc. v. Miller ex rel. Reed, 414 So. 3d 66, 71 (Miss. 2025)
- Hardaway v. Howard Indus., Inc., 378 So. 3d 946, 951 (Miss. 2024)
- City of Jackson v. Maxie ex rel. M.Y., 412 So. 3d 1156, 1159 (Miss. 2025)
- Anderson v. Wiggins, 331 So. 3d 1, 4 (Miss. 2020)
- Williams v. City of Batesville, 313 So. 3d 479, 482 (Miss. 2021)
- Sligh v. First Nat'l Bank of Holmes Cnty., 735 So. 2d 963, 966-70 (Miss. 1999)
- Broadwater v. Dorsey, 688 A.2d 436, 441-42 (Md. 1997)
- State v. Bricker, 581 A.2d 9, 12 (Md. 1990)
- Brown v. State, 102 So. 3d 1087, 1091 (Miss. 2012)
- Leasy v. Zollicoffer, 389 So. 2d 1378, 1380 (Miss. 1980)

- Penn-Star Ins. Co. v. Thompson, 368 So. 3d 1245, 1249 n.3 (Miss. 2023)
- Bullock Bros. Trucking Co. v. Carley, 930 So. 2d 1259, 1262 (Miss. Ct. App. 2005)
- Savage v. LaGrange, 815 So. 2d 485, 488-94 (Miss. Ct. App. 2002)
- Laurel Yamaha, Inc. v. Freeman, 956 So. 2d 897, 899, 903-05 (Miss. 2007)
- Lopez v. Langer, 761 P.2d 1225, 1228-29 (Idaho 1988)
- Green v. Harris, 70 P.3d 866, 871 (Okla. 2003)
- Zedella v. Gibson, 650 N.E.2d 1000, 1003 (Ill. 1995)
- Neary v. McDonald, 956 P.2d 1205, 1210 (Alaska 1998)
- Sullivan v. Tupelo Furniture Mkt., Inc. (Guardianship of Garvin), 127 So. 3d 197, 200-01 (Miss. 2013)
- Davis v. Seymour, 868 So. 2d 1061, 1064 (Miss. Ct. App. 2004)

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