

MICHIGAN COURT OF APPEALS

Jerika Jones v. David T. Hammons, Grane Transportation Lines, Ltd., and State Farm Mutual Automobile Insurance Company

Jones v. Hammons · No. 374665 · Decided February 18, 2026

SUMMARY

The Michigan Court of Appeals affirmed summary disposition for defendants in a motor-vehicle accident case involving a claim for noneconomic damages under Michigan’s no-fault act. The court held that the plaintiff failed to present evidence that her alleged impairment of body function was objectively manifested, distinguishing evidence of an injury from evidence of the injury’s effect on bodily function. The court did not reach the defendants’ cross-appeal regarding negligence.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                       |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Michigan Court of Appeals                                                                                                                                                                                                                             |
| WRITING FOR THE COURT | Brock A. Swartzle, P.J.; Allie Greenleaf Maldonado, J.; Matthew S. Ackerman, J.                                                                                                                                                                       |
| JURISDICTION          | Michigan Court of Appeals                                                                                                                                                                                                                             |
| DECIDED               | February 18, 2026                                                                                                                                                                                                                                     |
| DOCKET                | 374665                                                                                                                                                                                                                                                |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                              |
| PROCEDURAL POSTURE    | Plaintiff appealed the grant of summary disposition dismissing her claims against the trucking defendants. The trucking defendants cross-appealed the trial court's determination that a genuine issue of material fact existed regarding negligence. |
| STANDARD OF REVIEW    | De novo review applies to a trial court's ruling on a motion for summary disposition and to questions of statutory interpretation. A motion under MCR 2.116(C)(10) tests the factual sufficiency of a claim.                                          |
| PRECEDENTIAL VALUE    | unpublished and nonprecedential                                                                                                                                                                                                                       |
| PARTIES               | Jerika Jones v. David T. Hammons, Grane Transportation Lines, Ltd., State Farm Mutual Automobile Insurance Company                                                                                                                                    |

TOPICS

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## PRACTICE AREAS

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## QUESTIONS PRESENTED

1. Whether Jones produced evidence of an objectively manifested impairment sufficient to satisfy the serious-impairment-of-body-function threshold under MCL 500.3135(5)(a) and recover noneconomic damages under Michigan's no-fault act.
2. Whether the circuit court properly granted summary disposition on Jones's noneconomic-damages claim.
3. Whether the court needed to reach the defendants' cross-appeal concerning the existence of a genuine issue of material fact regarding Hammons's negligence.

## HOLDINGS

1. A plaintiff seeking noneconomic damages under Michigan's no-fault act must objectively manifest an impairment, meaning the effect of an injury on a body function, rather than merely objectively establish the existence of an injury. Jones's imaging studies, diagnoses, restrictions, and subjective descriptions did not provide evidence that her alleged functional impairments were observable or perceivable from actual symptoms or conditions by someone other than herself.
2. Summary disposition for defendants was proper because Jones failed to produce evidence establishing an objectively manifested impairment required by MCL 500.3135(5)(a).

## KEY QUOTATIONS

*“Under controlling caselaw, an impairment is not the injury itself, but the injury’s effect on a body function.”*  
(1)

*“The statute therefore requires objective manifestation of the impairment; since an impairment is an effect caused by an injury, a plaintiff must produce evidentiary support of the effect, not the injury as such.”* (4)

*“Because plaintiff has not produced evidence that her alleged impairment is objectively manifested, she cannot satisfy MCL 500.3135(5)(a). We therefore affirm the trial court’s grant of summary disposition.”* (6-7)

## FACTUAL BACKGROUND

On August 15, 2022, David Hammons, operating a semitruck for Grane Transportation Lines, rear-ended Jerika Jones's vehicle while Jones was assisting a disabled vehicle on I-94 near Kalamazoo. Jones received hospital treatment and later sought additional care, including imaging studies and diagnoses involving spinal and other pain conditions. She claimed limitations in household tasks and mobility, but the evidence she submitted primarily documented injuries and diagnoses rather than objectively observable impairments of specific bodily functions.

## PROCEDURAL HISTORY

Jones sued after a semitruck rear-ended her vehicle while she was attempting to assist a disabled vehicle on I-94. She asserted negligence-related claims and sought noneconomic and excess economic damages under Michigan's no-fault act, as well as PIP benefits from State Farm. The circuit court ruled that Jones could not prove a threshold injury for noneconomic damages, found a factual dispute regarding Hammons's negligence, granted State Farm partial summary disposition on lost wages, and entered an order dismissing Jones's claims against the trucking defendants in their entirety. Jones stipulated to dismissal of the remaining State Farm claim and appealed.

## DISPOSITION

affirmed

## CASES CITED

- Maiden v Rozwood, 461 Mich 109, 118; 597 NW2d 817 (1999)
- Ford Motor Co v Woodhaven, 475 Mich 425, 438; 716 NW2d 247 (2006)
- Quinto v Cross & Peters Co, 451 Mich 358, 362; 547 NW2d 314 (1996)
- Ouellette v Kenealy, 424 Mich 83, 85-86; 378 NW2d 470 (1985)
- McCormick v Carrier, 487 Mich 180, 196-198, 218; 795 NW2d 517 (2010)
- DiFranco v Pickard, 427 Mich 32, 74-75; 398 NW2d 896 (1986)
- Patrick v Turkelson, 322 Mich App 595, 599-602, 609-611; 913 NW2d 369 (2018)

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