

LOUISIANA COURT OF APPEAL, FIRST CIRCUIT

Darci Williamson v. BR Pig, LLC d/b/a Shopper's Value Foods

No. 2025 CW 0813 (1st Cir. 2026) · No. 2025 CW 0813 · Decided March 4, 2026

SUMMARY

The Louisiana Court of Appeal, First Circuit, granted supervisory writs and reversed the trial court’s denial of BR Pig, LLC’s motion for summary judgment in a merchant-liability slip-and-fall case. The court held that the plaintiff lacked factual support showing that the defendant had actual or constructive knowledge of the hazardous substance, which existed for one minute and nineteen seconds before the fall. The plaintiff’s claims were dismissed with prejudice.

CASE DETAILS

COURT	Louisiana Court of Appeal, First Circuit
WRITING FOR THE COURT	Lanier, J.; Wolfe, J.; Hester, J.
JURISDICTION	Louisiana Court of Appeal, First Circuit
DECIDED	March 4, 2026
DOCKET	2025 CW 0813
DISPOSITION	writ_granted
PROCEDURAL POSTURE	BR Pig, LLC sought supervisory writs from the denial of its motion for summary judgment in a premises-liability action.
STANDARD OF REVIEW	Summary judgment is proper when the movant establishes an absence of factual support for one or more elements of the opposing party's claim and the opposing party fails to produce evidence creating a genuine issue of material fact.
PRECEDENTIAL VALUE	unpublished
PARTIES	BR Pig, LLC d/b/a Shopper's Value Foods v. Darci Williamson

TOPICS

- premises liability
- summary judgment
- negligence
- writ of certiorari
- standard of review

PRACTICE AREAS

- premises liability
- negligence
- civil procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether BR Pig was entitled to summary judgment because Williamson lacked factual support showing that the store had actual or constructive knowledge of the hazardous condition before her fall.
2. Whether the one minute and nineteen seconds during which the hazard existed was sufficient to establish constructive notice under the Louisiana Merchant Liability Act.

HOLDINGS

1. BR Pig was entitled to summary judgment because Williamson provided no factual support creating a genuine issue of material fact that BR Pig had actual or constructive knowledge of the hazard before her fall.
2. The one minute and nineteen seconds that the substance existed before Williamson's fall was insufficient, on the evidence presented, to create a genuine issue of material fact regarding constructive notice.

KEY QUOTATIONS

“Regardless of whether La. R.S. 9:2800.6 or La. Civ. Code art. 2317.1 applies, a plaintiff must prove the condition presented an unreasonable risk of harm, the defendant had actual or constructive knowledge of the risk, and the defendant failed to exercise reasonable care.” (1)

“This court finds plaintiff has provided no factual support to create a genuine issue of material fact showing defendant had actual or constructive knowledge of the hazard prior to her slip incident.” (2)

FACTUAL BACKGROUND

Williamson slipped on a white substance similar in consistency to sour cream or yogurt at a Shopper's Value Foods store. Surveillance footage showed that the hazardous substance existed for exactly one minute and nineteen seconds before Williamson slipped. Williamson relied primarily on her deposition testimony that the store's quick response after being notified of the incident showed sufficient time to discover and remedy the hazard.

PROCEDURAL HISTORY

The City Court Judicial District Court for the Parish of East Baton Rouge denied BR Pig's motion for summary judgment on May 14, 2025. The Louisiana Court of Appeal, First Circuit, granted supervisory writs, vacated and reversed the trial court's judgment, granted summary judgment to BR Pig, and dismissed Williamson's claims with prejudice.

DISPOSITION

writ_granted

CASES CITED

- Woods v. Winn-Dixie Stores, Inc., 2022-0191 (La. App. 1st Cir. 9/16/22), 353 So. 3d 182

- *Farrell v. Circle K Stores, Inc.*, 2022-00849 (La. 3/17/23), 359 So. 3d 467
- *Nash v. Rouse's Enters., LLC*, 2015-1101 (La. App. 1st Cir. 2/26/16), 191 So. 3d 599

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