

COURT OF APPEALS OF IOWA

Nathan Freidhoff, Individually, Michelle Freidhoff and Todd Freidhoff, Individually and as Parents and Next Friends of Nathan Freidhoff v. Johnston Community School District, Mitch Eagles and Brett Becker

Freidhoff · No. No. 25-0610 · Decided May 13, 2026

SUMMARY

The Iowa Court of Appeals dismissed an interlocutory appeal from the denial of qualified immunity to Johnston Community School District and two employees. The court held that Iowa Code section 670.4A does not apply to the plaintiffs’ common-law tort claims under controlling Iowa Supreme Court precedent, including Doe v. Western Dubuque Community School District. Because the statute did not authorize the appeal, the court dismissed it for lack of appellate jurisdiction.

CASE DETAILS

COURT	Court of Appeals of Iowa
WRITING FOR THE COURT	Tabor, C.J.; Badding, J.; Bower, S.J.
JURISDICTION	Iowa Court of Appeals
DECIDED	May 13, 2026
DOCKET	No. 25-0610
DISPOSITION	dismissed
PROCEDURAL POSTURE	Interlocutory appeal from the Iowa District Court's denial of defendants' motion for summary judgment seeking qualified immunity under Iowa Code section 670.4A. The Iowa Supreme Court transferred the appeal to the Iowa Court of Appeals.
STANDARD OF REVIEW	The court reviewed the ruling as a motion-to-dismiss ruling for correction of errors at law, accepting the petition's alleged facts as true and viewing them in the light most favorable to the plaintiff. A motion to dismiss succeeds only when the plaintiff is not afforded a right to recover under the alleged facts.
PRECEDENTIAL VALUE	Published and precedential

PARTIES

Johnston Community School District, Mitch Eagles, Brett Becker v. Nathan Freidhoff, Individually, Michelle Freidhoff, Todd Freidhoff, Individually and as Parents and Next Friends of Nathan Freidhoff

TOPICS

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appellate jurisdiction

pleadings

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negligence

PRACTICE AREAS

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torts

municipal law

QUESTIONS PRESENTED

1. Whether Iowa Code section 670.4A's qualified-immunity defense and heightened pleading requirement apply to plaintiffs' common-law tort claims.
2. Whether the defendants could pursue an interlocutory appeal from the denial of qualified immunity under Iowa Code section 670.4A(4).
3. Whether the amended petition satisfied Iowa's notice-pleading standard.

HOLDINGS

1. Under *Doe v. Western Dubuque Community School District* and its progeny, Iowa Code section 670.4A's qualified-immunity provision and heightened pleading requirement apply to state constitutional and statutory claims, but not claims asserting only state common-law tort theories.
2. Because section 670.4A does not apply to plaintiffs' common-law tort claims, the defendants were not authorized by section 670.4A(4) to appeal the denial of qualified immunity, and the appeal had to be dismissed for lack of appellate jurisdiction.
3. The amended petition satisfied Iowa's notice-pleading standard because it provided fair notice of the incident, the general nature of the claims, and the facts supporting them; it was not required to identify a specific legal theory or plead ultimate facts supporting every element.

KEY QUOTATIONS

“The qualified immunity provision coupled with the heightened pleading standard only applies “where the plaintiff has asserted a state constitutional tort claim or statutory claim and not where the plaintiff has asserted only a state common law claim.”” (at 4)

“A pleading will satisfy that standard if it contains “factual allegations that give the defendant ‘fair notice’ of the claim asserted so the defendant can adequately respond to the petition.”” (at 6)

“Because section 670.4A does not apply to Friedhoff’s claims, Johnston is not authorized under 670.4A(4) to appeal the district court’s ruling.” (at 6)

FACTUAL BACKGROUND

In 2022, Nathan Freidhoff was enrolled in a welding class at Johnston High School. A spark ignited the synthetic-blend crewneck sweatshirt protruding beneath his cotton overshirt, causing serious burns. Freidhoff and his parents asserted common-law negligence, vicarious liability, negligent teaching and supervision, premises liability, and loss-of-parental-consortium claims against the school district and two instructors.

PROCEDURAL HISTORY

Plaintiffs sued Johnston Community School District and two employees for common-law tort claims arising from serious burns Nathan Freidhoff suffered in a high-school welding class. The district court treated the defendants' summary-judgment motion as a motion to dismiss, concluded that plaintiffs satisfied the heightened pleading requirement in Iowa Code section 670.4A(3), and denied qualified immunity. Defendants appealed under section 670.4A(4), but the Iowa Supreme Court transferred the appeal after deciding Doe and related cases.

DISPOSITION

dismissed

CASES CITED

- Doe v. Western Dubuque Community School District, 20 N.W.3d 798, 804-06 (Iowa 2025)
- Fogle ex rel. P.F. v. Clay Elementary School-Southeast Polk Community School District, 27 N.W.3d 538, 544-45 (Iowa 2025)
- In re Davenport Hotel Building Collapse, 27 N.W.3d 270, 273 (Iowa 2025)
- State v. Phillips, 996 N.W.2d 419, 423 (Iowa Ct. App. 2023)
- Nahas v. Polk County, 991 N.W.2d 770, 775-80 (Iowa 2023)
- 1000 Friends of Iowa v. Polk County Board of Supervisors, 19 N.W.3d 290, 294-96 (Iowa 2025)
- Meade v. Christie, 974 N.W.2d 770, 774-75 (Iowa 2022)
- Tigges v. City of Ames, 356 N.W.2d 503, 510 (Iowa 1984)
- Larson v. Holmes, No. 24-1912, 2025 WL 3171291, at *2-3 (Iowa Ct. App. Nov. 13, 2025)
- Blanchard v. City of Des Moines, No. 23-1953, 2024 WL 4965865, at *2 (Iowa Ct. App. Dec. 4, 2024)
- State v. Carroll, 767 N.W.2d 638, 644 (Iowa 2009)
- Rees v. City of Shenandoah, 682 N.W.2d 77, 79 (Iowa 2004)
- Terrace Hill Society Foundation v. Terrace Hill Commission, 6 N.W.3d 290, 296 (Iowa 2024)