

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Slager v. Woodloch Spa Resort, LP, et al.

Slager · No. 3:24-CV-0796 · Decided January 9, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania denied the defendants’ motion for summary judgment in a premises-liability action arising from Todd Slager’s fall on a snow-covered resort driveway. The court held that genuine disputes of material fact existed as to whether Slager fell because of snow and ice or because of an allegedly hazardous elevation change in the driveway, precluding application of the hills and ridges doctrine at summary judgment.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Joseph F. Saporito, Jr.
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	January 9, 2026
DOCKET	3:24-CV-0796
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs brought negligence claims arising from Todd Slager's fall at the defendants' resort. The defendants moved for summary judgment under Pennsylvania's hills and ridges doctrine.
STANDARD OF REVIEW	Summary judgment is proper only when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The evidence and reasonable inferences must be viewed in the light most favorable to the nonmoving party, and factual disputes supported by the record must be resolved by the factfinder.
PRECEDENTIAL VALUE	unpublished district court memorandum
PARTIES	Todd Slager, Aileen Glynn v. Woodloch Spa Resort, LP, et al.

TOPICS

- premises liability
- negligence
- summary judgment
- personal injury
- civil procedure

PRACTICE AREAS

premises liability

negligence

civil procedure

QUESTIONS PRESENTED

1. Whether the defendants were entitled to summary judgment under Pennsylvania's hills and ridges doctrine.
2. Whether genuine disputes of material fact existed concerning whether Slager's fall was caused by snow and ice or by an allegedly defective and inadequately maintained driveway.

HOLDINGS

1. Summary judgment was inappropriate because the record contained genuine disputes of material fact concerning whether the hills and ridges doctrine applied to Slager's accident.
2. The hills and ridges doctrine protects property owners from liability for generally slippery snow and ice conditions only when the plaintiff cannot establish an unreasonable accumulation in ridges or elevations, notice of the condition, and causation by the dangerous accumulation.

KEY QUOTATIONS

"The defendants' application of the hills and ridges doctrine is dependent on their categorization of Mr. Slager's injury."

"Factual issues, such as those presented in this case, are better left for the jury."

"The defendants' motion for summary judgement premised on the application of the hills and ridges doctrine will be denied."

FACTUAL BACKGROUND

On November 15, 2022, Todd Slager was staying in a cabin at Woodloch Pines Resort. After returning from a work conference during snowfall, he left the cabin to retrieve something from his vehicle and fell on a snow-covered driveway, sustaining serious ankle and leg fractures that required surgery. The parties disputed whether he fell because of snow and ice or because snow concealed an allegedly negligently maintained change in elevation in the driveway, as well as the timing and amount of snowfall.

PROCEDURAL HISTORY

The plaintiffs filed the action on May 14, 2024. After the parties submitted briefing and supporting evidence on the defendants' motion for summary judgment, the district court denied the motion because genuine disputes of material fact remained regarding the cause and characterization of Slager's fall.

DISPOSITION

other

CASES CITED

- 477 U.S. 242, 248
- 24 F.3d 508, 512
- 477 U.S. 317, 323
- 477 U.S. 477, 251-52
- 477 U.S. 331
- 994 F. Supp. 2d 593, 599
- 192 F.3d 378, 387 n.13
- 689 F. Supp. 2d 756, 762
- 176 A.2d 623, 625-26

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