

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Nicole Singletary v. Walmart, Inc.

Singletary · No. 1:23-cv-3435-JMC · Decided March 23, 2026

SUMMARY

The United States District Court for the District of Maryland denied Walmart, Inc.'s renewed motion for summary judgment in a premises-liability action brought by Nicole Singletary. The court held that factual questions remained regarding whether Walmart negligently failed to secure or inspect an acrylic television information sign that fell and injured the plaintiff.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	J. Mark Coulson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 23, 2026
DOCKET	1:23-cv-3435-JMC
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for renewed summary judgment after the Court previously denied its initial motion for summary judgment. The Court denied the renewed motion.
STANDARD OF REVIEW	Summary judgment is proper under Federal Rule of Civil Procedure 56(a) when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The Court views the facts in the light most favorable to the nonmoving party, and summary judgment is inappropriate where factual issues may reasonably be resolved in either party's favor.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order from a United States district court with no precedential-status designation in the source.

TOPICS

- premises liability
- summary judgment
- negligence
- duty of care
- standard of care

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Walmart was entitled to summary judgment because Plaintiff lacked expert or specific time-on-the-floor evidence establishing how long the fact tag had been unsecured.
2. Whether the evidence permitted a reasonable jury to find that Walmart had actual or constructive knowledge of the hazardous condition and failed to exercise reasonable care in inspecting and securing the fact tag.
3. Whether the evidence concerning Walmart's inspection policies and the supervisor's decision not to inspect the fact tag immediately before moving the television created genuine disputes of material fact.

HOLDINGS

1. Summary judgment was inappropriate because Maryland premises-liability law does not require direct time-on-the-floor evidence in every case where the circumstances permit a reasonable jury to infer negligence and constructive knowledge.
2. Whether Walmart's routine inspections were adequate and whether the supervisor acted reasonably by not checking the fact tag immediately before the television was moved were questions for the jury, precluding summary judgment.

KEY QUOTATIONS

“Whether the nature and frequency of the Defendant’s routine inspections to see that fact tags were adequately secured are sufficient, and whether Ms. Bennett’s specific decision not to check the fact tag at issue just prior to attempting to lifting the television (after enlisting or allowing non-employee Plaintiff to assist) was reasonable are questions for the jury.”

“Thus, the Court is also unpersuaded by the Defendant’s reliance on Maans, which involved a slip and fall over standing water on a store’s floor.”

FACTUAL BACKGROUND

On November 11, 2020, Nicole Singletary visited Walmart's Columbia, Maryland, store and sought assistance from team lead Julia Bennett in removing a television weighing more than fifty pounds from a raised display shelf. An acrylic information sign in front of the television was supposed to be bolted to the shelf, but it was not secured; when Singletary and Bennett lifted the television, the sign fell and struck Singletary, injuring her. Walmart's supervisor testified that fact tags were normally checked daily because customers had previously loosened them, but video evidence showed no employee specifically checked this sign during at least the hour before the incident, and Bennett admitted she did not check it immediately before the lift.

PROCEDURAL HISTORY

Plaintiff sued Walmart after an acrylic television information sign fell from a display shelf and struck her. The Court previously denied Walmart's initial summary-judgment motion, after which the parties completed expert discovery. Walmart renewed its motion, arguing principally that Plaintiff lacked expert or other evidence

establishing how long the allegedly unsecured sign had been defective. The Court again denied summary judgment, concluding that disputed facts permitted a jury to decide whether Walmart had actual or constructive knowledge of the hazardous condition and whether its inspection practices were reasonable.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 323-25 (1986)
- J.E. Dunn Const. Co. v. S.R.P. Dev. Ltd. P'ship, 115 F. Supp. 3d 593, 600 (D. Md. 2015)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 250 (1986)
- U.S. ex rel. James Commc'n, Inc. v. LACO Elec., Inc., No. DKC 14-0946, 2015 WL 1460131, at *2 (D. Md. Mar. 27, 2015)
- Scott v. Harris, 550 U.S. 372, 377 (2007)
- Emmett v. Johnson, 532 F.3d 291, 297 (4th Cir. 2008)
- Casper v. Charles F. Smith & Son, Inc., 316 Md. 573, 582 (1989)
- Moulden v. Greenbelt Consumer Servs., Inc., 239 Md. 229, 232 (1965)
- Rawls v. Hochschild, Kohn & Co., 207 Md. 113, 119 (1955)
- Maans v. Giant of Md., 161 Md. App. 620, 637 (2005)
- Dickey v. Hochschild, Kohn & Co., 157 Md. 448, 449, 452-53 (1929)
- Keye v. Red Roof Inns, Inc., No. WGC-07-2926, 2009 WL 10685426, at *8 (D. Md. May 20, 2009)