

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Kevin C. Betskoff v. Saia Motor Freight Line, LLC, et al.

Betskoff · No. 1:25-cv-02306-JMC · Decided November 25, 2025

SUMMARY

The United States District Court for the District of Maryland considered Defendants’ motion for summary judgment in a negligence action arising from a Pennsylvania motor vehicle accident. The court held that Pennsylvania law governed under Maryland’s *lex loci delicti* rule and denied summary judgment on the negligence and vicarious-liability claims because genuine factual disputes remained regarding the truck’s signaling and the parties’ comparative negligence. The court granted summary judgment on the negligent hiring, training, supervision, or retention claim and denied the request for Rule 11 sanctions and punitive damages.

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	November 25, 2025
DOCKET	1:25-cv-02306-JMC
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff brought negligence, vicarious liability, and negligent hiring, training, supervision, or retention claims arising from a motor vehicle accident. Defendants moved for summary judgment. The court granted the motion in part and denied it in part.
STANDARD OF REVIEW	Summary judgment is appropriate under Federal Rule of Civil Procedure 56 when the movant shows that no genuine dispute as to any material fact exists and the movant is entitled to judgment as a matter of law. The court views facts and reasonable inferences in the light most favorable to the nonmoving party, but unsupported speculation cannot create a genuine factual dispute. A summary-judgment motion is not premature where the nonmoving party has had a reasonable opportunity for discovery and the existing record permits resolution of the issues.
PRECEDENTIAL VALUE	unpublished

PARTIES

Kevin C. Betskoff v. Saia Motor Freight Line, LLC, Pedro V. Trinidad Holguin

TOPICS

negligence

comparative fault

vicarious liability

negligent supervision

summary judgment

PRACTICE AREAS

Torts

Civil procedure

Motor vehicle negligence

Choice of law

Employment-related vicarious liability

QUESTIONS PRESENTED

1. Whether Pennsylvania or Maryland law governed the tort claims under Maryland's choice-of-law rules.
2. Whether genuine disputes of material fact concerning the parties' conduct, signaling, comparative negligence, and causation precluded summary judgment on the negligence claim against Holguin.
3. Whether the same factual disputes precluded summary judgment on the vicarious-liability claim against Saia.
4. Whether summary judgment was proper on the negligent hiring, training, supervision, or retention claim against Saia where Saia admitted Holguin's employment and scope of employment but the record lacked evidence of reckless indifference or punitive-damages conduct.
5. Whether defendants were entitled to Rule 11 sanctions and attorney fees based on allegedly false or bad-faith factual allegations.

HOLDINGS

1. Pennsylvania law governs the plaintiff's tort claims because Maryland applies the *lex loci delicti* rule and the injury occurred in Pennsylvania; no Maryland public-policy exception applies.
2. Summary judgment is denied on the negligence claim because genuine disputes of material fact exist concerning the truck's signaling, the reasonableness of Betskoff's decision to pass, Holguin's conduct, and comparative negligence and causation.
3. Summary judgment is denied on the vicarious-liability claim because the unresolved factual dispute concerning Holguin's negligence also leaves a factual dispute concerning Saia's derivative liability, and Saia did not dispute Holguin's employment relationship.
4. Summary judgment is granted on Count III and on any punitive-damages claim against Saia because the plaintiff offered no evidence that Saia acted with the reckless indifference required for punitive damages, and the employer admitted Holguin's employment and scope of employment.
5. Rule 11 sanctions and attorney fees are denied because the plaintiff's description of the vehicle's movement as flipping into the air had some support in the footage and the plaintiff credibly explained that the description reflected his perception of the collision rather than bad faith.

KEY QUOTATIONS

“Rule 56 requires the Court to “grant summary judgment if 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.”” (Section II)

“Lex loci delicti requires the application of Pennsylvania law to this tort action.” (Section III.A)

“Therefore, in consideration of the existing factual dispute, the Court cannot conclude that Plaintiff’s negligence claim fails as a matter of law.” (Section III.B)

“Under Pennsylvania’s strict interpretation of reckless indifference to the rights of others, it cannot be said that there exists a genuine issue of material fact as to whether Defendant SAIA Motor Freight Line, Inc. acted with reckless indifference when it retained Defendant Trinidad Holguin.” (Section III.C)

FACTUAL BACKGROUND

On January 4, 2024, Kevin Betskoff was driving westbound on Main Street in McSherrystown, Pennsylvania, behind a Saia tractor-trailer driven by Pedro V. Trinidad Holguin. Holguin slowed or stopped near 5th Street, and the parties disputed whether the truck displayed a left-turn signal or hazard lights. Betskoff crossed a double-yellow line to pass the truck as it turned left, and the vehicles collided. The record included conflicting testimony and video evidence concerning the truck’s signals, the circumstances of the turn, and the conduct of the witnesses.

PROCEDURAL HISTORY

Betskoff filed the action on July 16, 2025. Defendants moved for summary judgment, and the parties submitted briefing and evidentiary materials, including videos, affidavits, and documents. The court requested supplemental briefing on the Pennsylvania-Maryland choice-of-law issue and comparative negligence. The court denied summary judgment on the negligence and vicarious-liability claims, granted summary judgment on the negligent hiring, training, supervision, or retention claim and any punitive-damages claim against Saia, declined to impose Rule 11 sanctions, and directed defendants to answer the amended complaint.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was ordered. Defendants were directed to file an answer to the amended complaint within fourteen days after entry of the order.

CASES CITED

- Blakely v. Wards, 738 F.3d 607, 611 (4th Cir. 2013), as amended (Oct. 22, 2013)
- Harrods Ltd. v. Sixty Internet Domain Names, 302 F.3d 214, 246-47 (4th Cir. 2002)
- Evans v. Technologies Applications & Service Co., 80 F.3d 954, 961 (4th Cir. 1996)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322 (1986)
- Gay v. Wall, 761 F.2d 175, 177 (4th Cir. 1985)

- Laughlin v. Metropolitan Washington Airports Authority, 149 F.3d 253, 260-61 (4th Cir. 1998)
- Sol v. M&T Bank, No. 8:22-CV-02999-AAQ, 2024 WL 327086, at *4 (D. Md. Jan. 29, 2024)
- McCray v. Maryland Department of Transportation, Maryland Transit Administration, 741 F.3d 480, 483 (4th Cir. 2014)
- J.E. Dunn Construction Co. v. S.R.P. Development Ltd. Partnership, 115 F. Supp. 3d 593, 600 (D. Md. 2015)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Bouchat v. Baltimore Ravens Football Club, Inc., 346 F.3d 514, 522 (4th Cir. 2003)
- Iko v. Shreve, 535 F.3d 225, 230 (4th Cir. 2008)
- Scott v. Harris, 550 U.S. 372, 377 (2007)
- Heckman v. Ryder Truck Rental, Inc., 962 F. Supp. 2d 792, 799-800 (D. Md. 2013)
- Drewitt v. Pratt, 999 F.2d 774, 778-79 (4th Cir. 1993)
- Deans v. CSX Transportation, Inc., 152 F.3d 326, 330-31 (4th Cir. 1998)
- Klaxon Co. v. Stentor Electric Manufacturing Co., 313 U.S. 487, 496 (1941)
- Erie Insurance Exchange v. Heffernan, 399 Md. 598, 925 A.2d 636, 648-49 (2007)
- Laboratory Corp. of America v. Hood, 395 Md. 608, 911 A.2d 841, 844-45, 849 (2006)
- Wells v. Liddy, 186 F.3d 505, 521 (4th Cir. 1999)
- Philip Morris Inc. v. Angeletti, 752 A.2d 200, 230, 232 (Md. 2000)
- White v. King, 223 A.2d 763, 765 (Md. 1966)
- Harvard v. Perdue Farms, Inc., 403 F. Supp. 2d 462, 466 (D. Md. 2005)
- Hutzell v. Boyer, 252 Md. 227, 249 A.2d 449 (1969)
- Knight v. Avco Corp., 2025 WL 2677533, at *4 (M.D. Pa. Sept. 18, 2025)
- Doland v. Berrios, 2015 WL 433598, at *5 (M.D. Pa. 2015)
- Burke v. TransAm Trucking, Inc., 605 F. Supp. 2d 647, 649 (M.D. Pa. 2009)
- Sonnenberg v. Erie Metropolitan Transit Authority, 586 A.2d 1026, 1027 (Pa. 1991)
- LeGrand v. Lincoln Lines, Inc., 384 A.2d 955, 956 (Pa. 1978)
- Alcovitz v. Gulph Mills Tennis Club, Inc., 812 A.2d 1218, 1222 (Pa. 2002)
- Ciotola v. Star Transportation & Trucking, LLC, 481 F. Supp. 3d 375, 390 (M.D. Pa. 2020)
- Adams v. U.S. Airways Group, Inc., 978 F. Supp. 2d 485, 496 (E.D. Pa. 2013)
- Belmont v. MB Investment Partners, Inc., 708 F.3d 470, 487-89 (3d Cir. 2013)
- Holben v. Midwest Emery Freight System, Inc., 252 F. Supp. 1224, 1224-25 (W.D. Pa. 1981)
- Sterner v. Titus Transportation, LP, 2013 WL 6506591, at *3-4 (M.D. Pa. Dec. 12, 2013)
- Fields v. Lebert, 2025 WL 2404247, at *5 (E.D. Pa. Aug. 19, 2025)
- SHV Coal, Inc. v. Continental Grain Co., 526 Pa. 489, 587 A.2d 702, 705 (Pa. 1991)
- Calhoun v. Van Loon, 2014 WL 3428876, at *2 (M.D. Pa. July 11, 2014)
- Burke v. Maassen, 904 F.2d 178, 181 (3d Cir. 1990)

