

SUPREME COURT OF PENNSYLVANIA

Mary Joan Gidor v. Benjamin E. Mangus d/b/a Mangus Inspections

No. 21 WAP 2024 · No. 21 WAP 2024 · Decided October 23, 2025

SUMMARY

In this concurring opinion, Justice Wecht agrees that the Pennsylvania Home Inspection Law’s one-year filing period functions as a statute of repose rather than a statute of limitations. The opinion concludes that the period begins upon delivery of the home inspection report and is not subject to the discovery rule. Justice Wecht also questions the reasoning of *Dubose v. Quinlan* and finds no material distinction between the language at issue there and the Home Inspection Law provision.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Justice David N. Wecht
JURISDICTION	Supreme Court of Pennsylvania, Western District
DECIDED	October 23, 2025
DOCKET	21 WAP 2024
DISPOSITION	other
PROCEDURAL POSTURE	Appeal from the Superior Court's January 8, 2024 order reversing and remanding the Crawford County Court of Common Pleas' September 20, 2022 order in a Home Inspection Law action.
PRECEDENTIAL VALUE	Published concurring opinion; the concurrence's reasoning is not independently binding.
PARTIES	Mary Joan Gidor v. Benjamin E. Mangus d/b/a Mangus Inspections

TOPICS

- statutory interpretation
- statute of limitations
- appellate procedure
- civil procedure
- real estate

PRACTICE AREAS

- statutory interpretation
- torts
- real estate
- civil procedure

QUESTIONS PRESENTED

1. Whether Section 7512 of the Pennsylvania Home Inspection Law functions as a statute of limitations or a statute of repose.
2. Whether the one-year period in Section 7512 is tied to accrual or discovery of the cause of action.
3. Whether Section 7512's text establishes a firm, unqualified deadline for bringing an action arising from a home inspection report.

HOLDINGS

1. Section 7512 functions as a statute of repose because it establishes a firm one-year period for filing an action measured from delivery of the home inspection report, without an express or implied accrual-based exception.
2. Gidor's claims were extinguished one year after delivery of Mangus's home inspection report.

KEY QUOTATIONS

“An action to recover damages arising from a home inspection report must be commenced within one year after the date the report is delivered.” (at 1-2)

“where the statute ties the running of the time to sue specifically to what the putative plaintiff knows and when, we have a statute of limitations.” (at 7)

“Section 7512 of the HIL functions as a statute of repose because it sets a fixed period of exposure that is defendant-centric, tied exclusively to delivery of the subject report.” (at 8)

FACTUAL BACKGROUND

The dispute concerns claims arising from a home inspection report prepared by Benjamin E. Mangus. The Home Inspection Law provides that an action to recover damages arising from a home inspection report must be commenced within one year after the report is delivered. Justice Wecht agreed that Gidor's claims were extinguished one year after delivery of the report, regardless of when the injury or claim accrued.

PROCEDURAL HISTORY

The Crawford County Court of Common Pleas entered an order on September 20, 2022. The Superior Court reversed and remanded that order on January 8, 2024. Mary Joan Gidor appealed to the Supreme Court of Pennsylvania, which issued a majority opinion addressing whether the Home Inspection Law's one-year filing period is a statute of limitations or a statute of repose. Justice Wecht concurred in the result but wrote separately to criticize the majority's reliance on *Dubose v. Quinlan*.

DISPOSITION

other

CASES CITED

- *Dubose v. Quinlan*, 173 A.3d 634 (Pa. 2017)

- Commonwealth v. Linton, 337 A.3d 467, 478 (Pa. 2025)
- Rice v. Diocese of Altoona-Johnstown, 255 A.3d 237, 247 (Pa. 2021)

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