

SUPREME COURT OF APPEALS OF WEST VIRGINIA

State ex rel. Jaguar Land Rover Limited v. The Hon. Charles King, Judge and Patricia A. Lyles

State ex rel. Jaguar Land Rover · No. 19-0222 · Decided November 1, 2019

SUMMARY

The Supreme Court of Appeals of West Virginia denied Jaguar Land Rover Limited's petition for a writ of prohibition challenging discovery orders and sanctions entered by the Circuit Court of Kanawha County. The court held that Jaguar had not shown an adequate basis for extraordinary relief and that the circuit court acted within its discretion under West Virginia Rule of Civil Procedure 37 in imposing attorney-fee and cost sanctions for discovery noncompliance. The court issued the opinion as a memorandum decision under Rule 21.

CASE DETAILS

COURT	Supreme Court of Appeals of West Virginia
WRITING FOR THE COURT	Chief Justice Elizabeth D. Walker; Justice Margaret L. Workman; Justice Tim Armstead; Justice Evan H. Jenkins; Justice John A. Hutchison
JURISDICTION	West Virginia
DECIDED	November 1, 2019
DOCKET	19-0222
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Jaguar Land Rover Limited petitioned for a writ of prohibition barring enforcement of circuit-court orders imposing discovery sanctions, including costs and attorney's fees. The Supreme Court of Appeals denied the writ.
STANDARD OF REVIEW	A writ of prohibition will not issue for a simple abuse of discretion; it is available when a trial court lacks jurisdiction or exceeds its legitimate powers. For a discretionary writ based on an alleged excess of legitimate authority, the court applies the five Hoover factors, giving substantial weight to clear legal error. Discovery and procedural rulings, including the choice of sanctions, are reviewed for abuse of discretion. A writ may correct clear legal error resulting from a substantial abuse of discretion concerning discovery orders.

PRECEDENTIAL VALUE	Memorandum decision under West Virginia Rule of Appellate Procedure 21; the opinion states that the case presents no new or significant issue of law.
PARTIES	State ex rel. Jaguar Land Rover Limited v. The Hon. Charles King, Judge, Patricia A. Lyles

TOPICS

sanctions

discovery dispute

writ of certiorari

appellate procedure

civil procedure

PRACTICE AREAS

Civil procedure

Discovery sanctions

Appellate procedure

Extraordinary writs

QUESTIONS PRESENTED

1. Whether the Circuit Court of Kanawha County exceeded its legitimate authority by finding that Jaguar failed to comply with discovery orders and imposing sanctions.
2. Whether the circuit court's sanctions order lacked adequate findings of fact and conclusions of law to satisfy due process.
3. Whether the award of \$67,295 in attorney's fees and \$8,312.25 in discovery-commissioner expenses constituted an abuse of discretion.

HOLDINGS

1. The writ of prohibition was unavailable because Jaguar failed to establish that the circuit court lacked jurisdiction, exceeded its legitimate powers, or satisfied the governing factors for discretionary prohibitory relief.
2. The circuit court acted within its authority under Rule 37 of the West Virginia Rules of Civil Procedure to compel discovery and impose sanctions for Jaguar's failure to comply with discovery orders.
3. The sanctions order satisfied applicable procedural and due-process requirements because it incorporated the discovery commissioner's detailed recommendations and identified the discovery misconduct and expenses supporting the award.
4. The \$67,295 attorney-fee award and \$8,312.25 discovery-commissioner expense award did not constitute an abuse of discretion.

KEY QUOTATIONS

“A writ of prohibition will not issue to prevent a simple abuse of discretion by a trial court. It will only issue where the trial court has no jurisdiction or having such jurisdiction exceeds its legitimate powers.” (at 2)

“A writ of prohibition is available to correct a clear legal error resulting from a trial court’s substantial abuse of its discretion in regard to discovery orders.” (at 3)

“The Due Process Clause of Section 10 of Article III of the West Virginia Constitution requires that there exist a relationship between the sanctioned party’s misconduct and the matters in controversy such that the transgression threatens to interfere with the rightful decision of the case.” (at 5)

FACTUAL BACKGROUND

Patricia Lyles was rendered paraplegic after her 2013 Land Rover was rear-ended by a coal truck in Kanawha County. During her product-liability litigation against Jaguar Land Rover Limited and other defendants, Lyles served interrogatories and document requests, and the circuit court entered multiple orders compelling Jaguar to respond. Jaguar repeatedly delayed or incompletely produced discovery, including documents covered by a Core Documents Agreement, leading the circuit court to impose sanctions and award Lyles attorney's fees and costs.

PROCEDURAL HISTORY

Patricia Lyles sued Jaguar and other defendants following a vehicle accident. After multiple discovery orders and alleged noncompliance by Jaguar, the Circuit Court of Kanawha County granted Lyles's motion for sanctions, required Jaguar to supplement its discovery responses, and awarded Lyles \$67,295 in attorney's fees and costs, plus \$8,312.25 for the discovery commissioner's expenses. Jaguar sought a writ of prohibition from the Supreme Court of Appeals, which denied relief.

DISPOSITION

writ_denied

CASES CITED

- State ex rel. Peacher v. Sencindiver, 160 W. Va. 314, 233 S.E.2d 425 (1977)
- State ex rel. Hoover v. Berger, 199 W. Va. 12, 483 S.E.2d 12 (1996)
- State Farm Mut. Auto. Ins. Co. v. Stephens, 188 W. Va. 622, 425 S.E.2d 577 (1992)
- McDougal v. McCammon, 193 W. Va. 229, 455 S.E.2d 788 (1995)
- State ex rel. U.S. Fid. & Guar. Co. v. Canady, 194 W. Va. 431, 460 S.E.2d 677 (1995)
- Shreve v. Warren Assoc., Inc., 177 W. Va. 600, 355 S.E.2d 389 (1987)
- Prager v. Meckling, 172 W. Va. 785, 310 S.E.2d 852 (1983)
- Bartles v. Hinkle, 196 W. Va. 381, 472 S.E.2d 827 (1996)