

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Najaffzada v. Prime Transport Systems, LLC, Amazon Logistics, Inc., and John Doe

Najaffzada · No. 1:25-cv-00546-BLW · Decided March 4, 2026

SUMMARY

The United States District Court for the District of Idaho grants Amazon Logistics, Inc.’s motion to stay proceedings pending the U.S. Supreme Court’s decision in Montgomery v. Caribe Transport II, LLC. The court concludes that all three Landis factors favor a stay because the decision may resolve whether the Federal Aviation Administration Authorization Act preempts the plaintiff’s negligent-selection and related claims against Amazon.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                          |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Idaho                                                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | B. Lynn Winmill                                                                                                                                                                                                                                                                                          |
| JURISDICTION          | United States District Court for the District of Idaho                                                                                                                                                                                                                                                   |
| DECIDED               | March 4, 2026                                                                                                                                                                                                                                                                                            |
| DOCKET                | 1:25-cv-00546-BLW                                                                                                                                                                                                                                                                                        |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | Defendant Amazon Logistics, Inc. moved to stay the proceedings pending the Supreme Court's decision in Montgomery v. Caribe Transport II, LLC, concerning FAAAA preemption of negligent-selection claims against freight brokers.                                                                        |
| STANDARD OF REVIEW    | A Landis stay is committed to the district court's sound discretion. The court weighs possible damage to the nonmoving party, hardship or inequity to the moving party, and the orderly course of justice, including whether a stay will simplify or complicate the issues, proof, and questions of law. |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                                                          |
| PARTIES               | Amazon Logistics, Inc. v. Ali Najaffzada                                                                                                                                                                                                                                                                 |

TOPICS

- civil procedure
- negligence
- commercial litigation
- statutory interpretation
- torts

## PRACTICE AREAS

civil procedure

commercial litigation

personal injury

negligence

## QUESTIONS PRESENTED

1. Whether the court should stay the proceedings under Landis pending the Supreme Court's decision in *Montgomery v. Caribe Transport II, LLC*.
2. Whether the potential delay, discovery concerns, hardship to Amazon, and risk of duplicative litigation supported granting the stay.

## HOLDINGS

1. A stay was warranted because all three Landis factors favored staying the proceedings: the limited delay would not cause cognizable prejudice to Najaffzada, Amazon would face hardship if required to litigate claims potentially barred by FAAAA preemption, and the Supreme Court's forthcoming decision could materially simplify the litigation.
2. The stay did not preclude Najaffzada from attempting to locate the drivers identified by Amazon or from conducting his own investigative efforts and third-party discovery during the stay.

## KEY QUOTATIONS

*"The stay will be automatically lifted as of the date the Supreme Court resolves Montgomery."* (Memorandum Decision and Order at 9)

*"The parties must submit a joint status report within 14 days of the decision in Montgomery addressing the impact of the decision on this case and proposing a schedule for further proceedings."* (Memorandum Decision and Order at 9)

## FACTUAL BACKGROUND

Najaffzada was injured when a commercial vehicle sideswiped his parked semi-truck while he was asleep in a rest-area sleeper berth. The unidentified driver fled, but Najaffzada photographed the vehicle's license plate and USDOT numbers and traced the vehicle to Prime Transport. He alleged that Amazon was liable for vicarious and agency-related negligence and for negligent hiring, training, supervision, and retention in selecting Prime Transport and the driver to transport freight. Amazon had identified two drivers assigned to the relevant load and provided their last known contact information.

## PROCEDURAL HISTORY

Najaffzada filed a personal-injury action against Amazon Logistics, Inc., Prime Transport Systems, LLC, and John Doe. Prime Transport was served, failed to appear, and had a clerk's entry of default; John Doe had not been identified or served. Amazon moved to stay the case, and the district court granted the motion pending the Supreme Court's resolution of *Montgomery*.

## DISPOSITION

other

## CASES CITED

- *Montgomery v. Caribe Transport II, LLC*, No. 24-1238
- *Landis v. North American Co.*, 299 U.S. 248, 254-57 (1936)
- *CMAX, Inc. v. Hall*, 300 F.2d 265, 268-69 (9th Cir. 1962)
- *Dependable Highway Express, Inc. v. Navigators Insurance Co.*, 498 F.3d 1059, 1066 (9th Cir. 2007)
- *Ye v. GlobalTranz Enterprises, Inc.*, 74 F.4th 453, 465-66 (7th Cir. 2023)
- *Aspen American Insurance Co. v. Landstar Ranger, Inc.*, 65 F.4th 1261, 1271-72 (11th Cir. 2023)
- *Miller v. C.H. Robinson Worldwide, Inc.*, 976 F.3d 1016, 1031 (9th Cir. 2020)
- *Cox v. Total Quality Logistics, Inc.*, 142 F.4th 847, 858 (6th Cir. 2025)
- *Lockyer v. Mirant Corp.*, 398 F.3d 1098, 1110-12 (9th Cir. 2005)
- *In re Micron Technology, Inc. Securities Litigation*, No. CV-06-085-S-BLW, 2009 WL 10678270, at \*2-4 (D. Idaho Dec. 7, 2009)
- *Aleisa v. Square, Inc.*, 493 F. Supp. 3d 806, 816 (N.D. Cal. 2020)
- *Robledo v. Randstad US, L.P.*, No. 17-cv-01003-BLF, 2017 WL 4934205, at \*4 (N.D. Cal. Nov. 1, 2017)
- *Schriner v. Gerard*, No. CIV-23-206-D, 2024 WL 3824800, at \*5 n.3 (W.D. Okla. Aug. 14, 2024)

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