

OHIO COURT OF APPEALS, EIGHTH APPELLATE DISTRICT, CUYAHOGA COUNTY

Taye v. Cuyahoga Hills Juvenile Correctional Facility

2026-Ohio-39 · No. 115004 · Decided January 8, 2026

SUMMARY

The Eighth District Court of Appeals reversed and remanded a summary judgment entered in favor of Cuyahoga Hills Juvenile Correctional Facility in Alexander Taye’s workers’ compensation claim. The court held that R.C. 4123.01(C)(5) does not require pre-injury medical documentation of a preexisting condition, and that the medical evidence presented created a genuine issue of material fact regarding substantial aggravation. The court sustained Taye’s second assignment of error and found his first assignment moot.

CASE DETAILS

COURT	Ohio Court of Appeals, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	William A. Klatt, J.; Michelle J. Sheehan, A.J.; Emanuella D. Groves, J.
JURISDICTION	Ohio Court of Appeals, Eighth Appellate District, Cuyahoga County
DECIDED	January 8, 2026
DOCKET	115004
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Alexander Taye appealed the Cuyahoga County Court of Common Pleas' judgment granting Cuyahoga Hills Juvenile Correctional Facility's motion for summary judgment in Taye's workers' compensation claim.
STANDARD OF REVIEW	Summary judgment is reviewed de novo. Under Civ.R. 56(C), summary judgment is proper when no genuine issue of material fact remains, the moving party is entitled to judgment as a matter of law, and reasonable minds can reach only a conclusion adverse to the nonmoving party when the evidence is construed most strongly in that party's favor.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Alexander Taye v. Cuyahoga Hills Juvenile Correctional Facility, et al.

TOPICS

workers compensation

summary judgment

statutory interpretation

standard of review

appellate procedure

PRACTICE AREAS

workers compensation

employment law

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QUESTIONS PRESENTED

1. Whether the trial court erred by granting summary judgment on the ground that Taye lacked pre-injury medical documentation of the preexisting shoulder conditions.
2. Whether R.C. 4123.01(C)(5) requires medical documentation of a preexisting condition before the workplace injury in order to establish substantial aggravation.
3. Whether the trial court's grant of summary judgment rendered Taye's evidentiary and due-process arguments moot.

HOLDINGS

1. R.C. 4123.01(C)(5) does not require a workers' compensation claimant to present medical documentation of the preexisting condition from before the workplace injury. The statute requires objective diagnostic findings, objective clinical findings, or objective test results documenting substantial aggravation, and subjective complaints may also be considered.
2. Summary judgment for the employer was improper because Taye's evidence was sufficient to create a genuine issue of material fact concerning whether the workplace incident substantially aggravated his preexisting shoulder conditions.

KEY QUOTATIONS

“There is no language anywhere in the statute that requires the pre-existing condition to be medically documented prior to the workplace injury that allegedly aggravated the condition.” (Legal Analysis, section B)

“Accordingly, any requirement that a claimant must present pre-injury documentation of the pre-existing condition before the claimant may recover under R.C. 4123.01(C)(5) for substantial aggravation of the condition adds a requirement that is not in the statute.” (Legal Analysis, section B)

“Such evidence was sufficient to demonstrate a genuine issue of material fact and to defeat summary judgment.” (Legal Analysis, section B)

FACTUAL BACKGROUND

Alexander Taye, a juvenile corrections officer, alleged that an April 27, 2021 workplace incident substantially aggravated preexisting degenerative conditions in his left shoulder, including a partial rotator cuff tear and impingement. His workers' compensation claim initially covered several sprains, but the Industrial Commission disallowed his request to add the shoulder conditions. Taye's treating chiropractor testified that clinical tests performed shortly after the incident, an MRI obtained several months later, and Taye's subjective complaints

supported substantial aggravation caused by the work incident, although subsequent workplace altercations may also have contributed to the MRI findings.

PROCEDURAL HISTORY

Taye sought to amend his workers' compensation claim to include substantial aggravations of a preexisting partial left rotator cuff tear and shoulder impingement. The Industrial Commission disallowed the additional conditions, and Taye appealed to the common pleas court under R.C. 4123.512. The trial court initially denied the employer's summary-judgment motion, then sua sponte reconsidered and granted it after reviewing deposition testimony. The Court of Appeals reversed, vacated the summary-judgment entry, and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The trial court's March 12, 2025 journal entry granting summary judgment is vacated, and the matter is remanded for further proceedings consistent with the opinion.

CASES CITED

- Temple v. Wean United, Inc., 50 Ohio St.2d 317 (1977)
- Dresher v. Burt, 1996-Ohio-107, ¶ 17
- Morris v. First Natl. Bank & Trust Co., 21 Ohio St. 2d 25 (1970)
- Bayview Loan Servicing, L.L.C. v. St. Cyr, 2017-Ohio-2758, ¶ 11 (8th Dist.)
- Fabro v. OhioHealth Corp., 2014-Ohio-5161, ¶ 9 (10th Dist.)
- Briggs v. Franklin Pre-Release Ctr., 2014-Ohio-2477, ¶ 10 (12th Dist.)
- Phipps v. Internatl. Paper Co., 2013-Ohio-3994, ¶ 12 (12th Dist.)
- Gardi v. Bd. of Edn., 2013-Ohio-3436, ¶ 11-12 (8th Dist.)
- Hubbard v. Canton City School Bd. of Edn., 2002-Ohio-6718, ¶ 14
- Haynik v. Sherwin-Williams Co., 2014-Ohio-1620, ¶ 17 (8th Dist.)
- Lake v. Anne Grady Corp., 2013-Ohio-4740 (6th Dist.)