

SUPREME COURT OF ALABAMA

West Fraser, Inc. v. Caldwell

104 So. 3d 901 (Ala. 2012) · Decided July 20, 2012

SUMMARY

The Alabama Supreme Court held that the trial court’s finding that Windell Caldwell suffered a compensable workers’ compensation injury was supported by substantial evidence. The Court concluded that the Court of Civil Appeals improperly reweighed the evidence in conflict with the applicable standard of appellate review. The judgment of the Court of Civil Appeals was reversed and the case remanded.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	Stuart, Justice; Malone, C.J.; Woodall, J.; Bolin, J.; Parker, J.; Shaw, J.; Main, J.; Wise, J.; Murdock, J.
JURISDICTION	Alabama
DECIDED	July 20, 2012
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	West Fraser petitioned for a writ of certiorari after the Alabama Court of Civil Appeals reversed a trial court judgment awarding Caldwell workers' compensation benefits. The Supreme Court of Alabama granted review to determine whether the intermediate appellate court improperly reweighed the evidence in conflict with Ex parte McInish.
STANDARD OF REVIEW	Under Alabama Code § 25-5-81(e), pure findings of fact in workers' compensation cases may not be reversed if supported by substantial evidence. When evidence is presented ore tenus, the trial court determines witness credibility and weighs the evidence; the appellate court may not reweigh the evidence and must view the facts in the light most favorable to the trial court's findings.
PRECEDENTIAL VALUE	Published, precedential decision of the Supreme Court of Alabama
PARTIES	West Fraser, Inc. v. Windell Caldwell, Sr.

TOPICS

workers compensation

appellate procedure

standard of review

evidence

PRACTICE AREAS

workers' compensation

appellate procedure

evidence

QUESTIONS PRESENTED

1. Whether the Alabama Court of Civil Appeals exceeded the scope of appellate review by reweighing ore tenus evidence rather than determining whether the trial court's finding was supported by substantial evidence.
2. Whether the totality of the evidence constituted substantial evidence supporting the trial court's finding that Caldwell's back injury was work-related and compensable.

HOLDINGS

1. An appellate court may not reweigh evidence or substitute its credibility determinations for those of the trial court; its review is limited to determining whether the trial court's findings are supported by substantial evidence and whether the correct legal conclusions were drawn.
2. The totality of the evidence constituted substantial evidence from which fair-minded persons could reasonably infer that Caldwell injured his back at work and that the injury was compensable.

KEY QUOTATIONS

“In reviewing a decision of the trial court, an appellate court is not permitted to reweigh the evidence, because weighing the evidence is solely a function of the trier of fact. However, it is the function of the appellate court to ascertain that the trial court’s findings of fact are supported by substantial evidence”
(104 So. 3d at 905)

“The trial court reconciled the conflicting testimony, weighed the evidence, and concluded that Caldwell’s injury was compensable.” (104 So. 3d at 906)

FACTUAL BACKGROUND

Caldwell alleged that he injured his back on December 17, 2009, while lifting heavy boxes and moving an 80-pound screen while replacing knives on a mulching machine for West Fraser. He testified that he reported the pain to his supervisor and that he and his wife informed medical personnel that the injury was work-related, although the first two medical records stated that no injury was reported or that Caldwell denied an injury. Later medical records identified a December 17 injury, and an orthopedic surgeon testified that Caldwell's injury was consistent with the lifting incident, although it could have occurred in other ways. The trial court credited Caldwell and his wife and found the injury compensable.

PROCEDURAL HISTORY

Caldwell sued West Fraser for workers' compensation benefits arising from an alleged work-related back injury. After an ore tenus hearing, the trial court found the injury compensable and awarded medical coverage and temporary total disability benefits. The Alabama Court of Civil Appeals reversed, concluding that the evidence did not constitute substantial evidence of compensability. The Supreme Court of Alabama reversed the Court of Civil Appeals and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded to the Alabama Court of Civil Appeals for proceedings consistent with the opinion.

CASES CITED

- West Fraser, Inc. v. Caldwell, 104 So. 3d 889 (Ala. Civ. App. 2012)
- Ex parte McInish, 47 So. 3d 767, 778 (Ala. 2008)
- Ex parte Trinity Indus., Inc., 680 So. 2d 262, 268-69 (Ala. 1996)
- West v. Founders Life Assurance Co., 547 So. 2d 870, 871 (Ala. 1989)
- Blackman v. Gray Rider Truck Lines, Inc., 716 So. 2d 698, 700 (Ala. Civ. App. 1998)
- Fryfogle v. Springhill Mem'l Hosp., Inc., 742 So. 2d 1255 (Ala. Civ. App. 1998), aff'd, 742 So. 2d 1258 (Ala. 1999)
- Ex parte Professional Bus. Owners Ass'n Workers' Comp. Fund, 867 So. 2d 1099, 1102 (Ala. 2003)
- Ex parte Hayes, 70 So. 3d 1211, 1215 (Ala. 2011)
- Ex parte Southern Energy Homes, Inc., 873 So. 2d 1116 (Ala. 2003)
- Jackson Landscaping, Inc. v. Hooks, 844 So. 2d 1267 (Ala. Civ. App. 2002)
- G.UB.MK. Constructors v. Davis, 45 So. 3d 1277 (Ala. Civ. App. 2010)