

DISTRICT OF COLUMBIA COURT OF APPEALS

Evelyn F. Spindle and Robert Lee Spindle, Jr. v. Pearl Reid

Spindle v. Reid, 277 A.2d 117 (D.C. 1971) · No. No. 5512 · Decided May 13, 1971

SUMMARY

The District of Columbia Court of Appeals held that conflicting evidence regarding an intersectional automobile collision supported the jury's findings on negligence and contributory negligence. It reversed the judgment against the vehicle's registered owner, concluding that she held only naked legal title and was not the statutory owner because her son had exclusive control and use of the vehicle, while affirming the judgment against the son.

CASE DETAILS

COURT	District of Columbia Court of Appeals
WRITING FOR THE COURT	Hood, Chief Judge; Kern, Associate Judge; Gallagher, Associate Judge
JURISDICTION	District of Columbia
DECIDED	May 13, 1971
DOCKET	No. 5512
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Automobile-accident defendants appealed from a judgment awarding damages to the plaintiff. They challenged the sufficiency of the evidence supporting the verdict and the liability of the registered owner, Robert's mother.
STANDARD OF REVIEW	The court reviewed whether the evidence was sufficient to create jury questions on negligence and contributory negligence and whether Evelyn Spindle was entitled to a directed verdict. On undisputed facts concerning ownership and control, the court reviewed the directed-verdict issue as a question of law.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Evelyn F. Spindle, Robert Lee Spindle, Jr. v. Pearl Reid

TOPICS

- negligence
- contributory negligence
- vicarious liability
- statutory interpretation
- appellate procedure

PRACTICE AREAS

torts

motor vehicle liability

appellate procedure

QUESTIONS PRESENTED

1. Whether the conflicting evidence concerning the conduct of the drivers was sufficient to support the jury's findings concerning negligence and contributory negligence.
2. Whether Evelyn F. Spindle, as the registered legal titleholder, was an owner within the meaning of the District of Columbia Motor Vehicle Safety Responsibility Act and therefore legally responsible for Robert's negligent operation of the automobile.

HOLDINGS

1. The conflicting testimony concerning the intersectional collision presented questions of fact for the jury on both negligence and contributory negligence, and the verdict would not be disturbed.
2. Registration of legal title in a person's name is not conclusive ownership under the Act. A person who holds only naked legal title and has no immediate right to control or prevent the vehicle's use is not the statutory owner for purposes of liability for the operator's negligence.

KEY QUOTATIONS

“The object was to control the giving of consent to irresponsible drivers by the one having that power rather than to impose liability upon one having a naked legal title with no immediate right of control.” (118)

“The foregoing cases established the rule in this jurisdiction that registration of legal title in one's name is not conclusive as to ownership within the meaning of the statute.” (119)

FACTUAL BACKGROUND

Robert Lee Spindle, Jr. was operating an automobile involved in an intersectional collision with Pearl Reid's automobile. Although title to the automobile was placed in his mother Evelyn's name because a financing bank would not deal directly with Robert while he was a minor, Robert made all payments, retained full control and use of the vehicle, and supplied the downpayment through his former automobile. Evelyn never used the car and understood that it belonged to Robert, who was 19, married, employed, and living away from her home.

PROCEDURAL HISTORY

After an intersectional collision, the jury found in favor of Pearl Reid and against Robert Lee Spindle, Jr., and Evelyn F. Spindle. The District of Columbia Court of Appeals held that the evidence presented jury questions concerning negligence and contributory negligence, affirmed the judgment against Robert, and reversed the judgment against Evelyn because she was entitled to a directed verdict.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The judgment against Evelyn F. Spindle was reversed because she was entitled to a directed verdict. The judgment against Robert Lee Spindle, Jr. was affirmed.

CASES CITED

- Smith v. Doyle, 69 App. D.C. 60, 98 F.2d 341 (1938)
- Mason v. Automobile Finance Co., 73 App. D.C. 284, 121 F.2d 32 (1941)
- Johnson v. Keyes, D.C. App., 201 A.2d 24 (1964)
- Williams v. Rawlings Truck Line Inc., 123 U.S. App. D.C. 121, 357 F.2d 581 (1965)
- Bush v. Johnson, D.C. App., 215 A.2d 850 (1966)
- Burt v. Cordover, D.C. Mun. App., 117 A.2d 116 (1955)
- Ferguson v. Hurford, 132 Colo. 507, 290 P.2d 229 (1955)
- Tuttle v. Trent, 3 Conn. Cir. 591, 222 A.2d 586 (1966)

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