

SUPREME COURT OF ALABAMA

Ex parte Mike Griffin, Eddie Pate, and Scott Engle (In re: Gary Jackson v. Mike Griffin et al.)

SC-2025-0443 · No. SC-2025-0443 · Decided December 19, 2025

SUMMARY

The Supreme Court of Alabama denied a petition for a writ of mandamus seeking review of the denial of co-employees' summary-judgment motion based on workers' compensation immunity. The special concurrence discussed whether an employer that substantially modifies equipment may qualify as the machine's manufacturer under Ala. Code § 25-5-11(c)(2), and whether Alabama precedent has improperly expanded the meaning of safety-device removal and the statute's willful-and-intentional mens rea requirement. The concurrence concluded that these issues were not suitable for resolution at the mandamus stage.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	Stewart, C.J.; Shaw, J.; Bryan, J.; Mendheim, J.; McCool, J.; Cook, J.; Wise, J.; Sellers, J.
JURISDICTION	Supreme Court of Alabama
DECIDED	December 19, 2025
DOCKET	SC-2025-0443
DISPOSITION	writ_denied
PROCEDURAL POSTURE	The defendants petitioned for a writ of mandamus challenging the Jefferson Circuit Court's denial of their summary-judgment motion based on alleged immunity under Alabama's workers' compensation laws.
STANDARD OF REVIEW	Mandamus requires a clear legal right to the requested order, an imperative duty accompanied by refusal to perform it, no other adequate remedy, and properly invoked jurisdiction. Review of a denial of summary judgment is de novo, with the record viewed in the light most favorable to the nonmovant and reasonable doubts resolved against the movant. On a mandamus petition challenging denial of summary judgment on immunity grounds, review is confined to immunity.

PRECEDENTIAL VALUE	Published; per curiam petition denied without opinion. The substantive statutory analysis is contained in a special concurrence and is not a binding merits holding.
PARTIES	Mike Griffin, Eddie Pate, Scott Engle v. Gary Jackson

TOPICS

writ of certiorari summary judgment appellate procedure workers compensation statutory interpretation

PRACTICE AREAS

appellate procedure civil procedure workers compensation employment law statutory interpretation
remedies

QUESTIONS PRESENTED

1. Whether the defendants established a clear legal right to mandamus relief from the denial of summary judgment based on coemployee immunity under Ala. Code § 25-5-53.
2. Whether the record and procedural posture permitted the Supreme Court to decide whether AMICO became the machine's manufacturer through substantial modifications.
3. Whether the Supreme Court should reconsider Alabama precedent interpreting removal, willful and intentional conduct, and knowledge under Ala. Code § 25-5-11(c)(2).

HOLDINGS

1. The petition for a writ of mandamus was denied.
2. The denial of mandamus did not decide whether AMICO became the manufacturer through substantial modifications or whether sufficient evidence existed for a jury to determine that issue.
3. The court did not reach or resolve whether existing precedent's interpretations of removal, willful and intentional conduct, or knowledge are consistent with the statute.

KEY QUOTATIONS

“A petitioner seeking the drastic and extraordinary remedy of a writ of mandamus must demonstrate all four of the following to warrant the issuance of a writ” (7)

“The parties deserve due process and thus deserve an opportunity to (1) know what the arguments and evidence against them are and (2) be able to respond to those arguments and evidence.” (11)

“That reading blurs the statute's distinction between intentional conduct and ordinary negligence, and it risks converting a narrow exception into a broad one.” (20)

FACTUAL BACKGROUND

Gary Jackson was injured at an Alabama Metal Industries Corporation facility when his hand entered a leveler machine, resulting in the loss of three fingers. Jackson alleged that a coworker's willful and intentional removal of a manufacturer-provided safety guard caused the injury. The machine had originally been purchased used, and AMICO later added a conveyor belt, funnel, wings, and a safety bar. Jackson obtained workers' compensation benefits through a settlement and then sued coworkers Mike Griffin, Eddie Pate, and Scott Engle.

PROCEDURAL HISTORY

Gary Jackson sued three coworkers for injuries sustained when his hand was caught in a leveler machine. After discovery, the coworkers moved for summary judgment, asserting immunity under the Alabama Workers' Compensation Act. The Jefferson Circuit Court denied the motion, and the coworkers sought mandamus relief. The Supreme Court of Alabama denied the petition without an opinion; Justice Cook concurred specially and explained that the mandamus standard and procedural deficiencies prevented relief at that stage.

DISPOSITION

writ_denied

CASES CITED

- Ex parte Gulf Health Hosps., Inc., 321 So. 3d 629, 632 (Ala. 2020)
- Ex parte BOC Grp., Inc., 823 So. 2d 1270, 1272 (Ala. 2001)
- Ex parte Inverness Constr. Co., 775 So. 2d 153, 156 (Ala. 2000)
- Ex parte Tenax Corp., 228 So. 3d 387, 391 (Ala. 2017)
- Ex parte Morgan, 392 So. 3d 33, 41 (Ala. 2023)
- Ex parte Canada, 890 So. 2d 968, 970 (Ala. 2004)
- Wilson v. Manning, 880 So. 2d 1101, 1102 (Ala. 2003)
- Hobson v. American Cast Iron Pipe Co., 690 So. 2d 341, 344 (Ala. 1997)
- Potter v. First Real Estate Co., 844 So. 2d 540, 545 (Ala. 2002)
- Nationwide Prop. & Cas. Ins. Co. v. DPF Architects, P.C., 792 So. 2d 369, 372 (Ala. 2000)
- Harris v. Gill, 585 So. 2d 831, 836 (Ala. 1991)
- Southampton 100, LLC v. Alabama Dep't of Revenue, [Ms. SC-2025-0227, Nov. 26, 2025] ____ So. 2d. ____
- Hyundai Constr. Equip. Americas, Inc. v. Southern Lift Trucks, LLC, 392 So. 3d 716, 729
- Alabama Dep't of Revenue v. Greenetrack, Inc., 369 So. 3d 640 (Ala. 2022)
- Dobbs v. Jackson Women's Health Org., 597 U.S. 215, 293-94 (2022)
- Bailey v. Hogg, 547 So. 2d 498, 499-500 (Ala. 1989)
- Moore v. Reeves, 589 So. 2d 173, 178 (Ala. 1991)
- Leader v. Pablo, 411 So. 3d 1234 (Ala. 2024)
- Murray v. Manz, 813 So. 2d 918 (Ala. Civ. App. 2001)
- Jackson v. Hill, 670 So. 2d 917, 918-19 (Ala. 1995)
- King v. Cape, 907 So. 2d 1066, 1074 (Ala. Civ. App. 2005)

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