

SUPREME COURT OF RHODE ISLAND

Sean LaFreniere et al. v. Michael P. Dutton et al.

44 A.3d 1241 (R.I. 2012) · No. No. 2011-244-Appeal · Decided June 7, 2012

SUMMARY

The Rhode Island Supreme Court affirmed summary judgment for Michael P. Dutton in a negligence action arising from a motor-vehicle collision involving an employee. The court held that the plaintiff's receipt of workers' compensation benefits invoked the Workers' Compensation Act's exclusivity provision and barred a tort action against Dutton, the sole proprietor and plaintiff's employer.

CASE DETAILS

COURT	Supreme Court of Rhode Island
WRITING FOR THE COURT	Justice Goldberg; Suttell, C.J.; Goldberg, J.; Flaherty, J.; Robinson, J.; Indeglia, J.
JURISDICTION	Rhode Island
DECIDED	June 7, 2012
DOCKET	No. 2011-244-Appeal
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed from the Superior Court's grant of summary judgment to defendant in a negligence action arising from an automobile accident. The Supreme Court considered the appeal pursuant to a show-cause order and summarily affirmed.
STANDARD OF REVIEW	The Supreme Court reviews a grant of summary judgment de novo, views the evidence in the light most favorable to the nonmoving party, and affirms when no genuine issue of material fact exists and the moving party is entitled to judgment as a matter of law.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Rhode Island
PARTIES	Sean LaFreniere v. Michael P. Dutton, Metropolitan Property and Casualty Insurance Company

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether Dutton was LaFreniere's employer for purposes of the Workers' Compensation Act because Dutton was the sole proprietor of the landscaping business.
2. Whether LaFreniere's acceptance of workers' compensation benefits barred his tort action against Dutton under the Workers' Compensation Act's exclusivity provision.
3. Whether summary judgment was proper when LaFreniere argued that the trip was undertaken for personal reasons and that Dutton did not qualify for statutory protection.

HOLDINGS

1. Dutton was LaFreniere's employer because he was the sole proprietor of M.P. Dutton Landscaping and paid LaFreniere wages to accompany him on the trip.
2. LaFreniere's acceptance of approximately \$41,000 in workers' compensation benefits relinquished his right to sue Dutton in tort for the same injuries.
3. Summary judgment for Dutton was proper because no genuine issue of material fact affected the application of the Workers' Compensation Act's exclusivity provision, and Dutton was entitled to judgment as a matter of law.

KEY QUOTATIONS

“Similarly, as the sole proprietor of M.P. Dutton Landscaping, defendant was plaintiff’s employer and, as such, defendant was entitled to the protection provided by § 28-29-20.” (44 A.3d at 1244)

“We are of the opinion that the plaintiff relinquished his right to sue Dutton in tort after accepting the \$41,000 in workers' compensation benefits from Beacon.” (44 A.3d at 1245)

FACTUAL BACKGROUND

Sean LaFreniere was injured while riding as a passenger in a pickup truck owned and operated by Michael Dutton. Dutton used the truck in his landscaping business, and LaFreniere had been paid wages to accompany him on a trip that included a work-related stop. After the accident, LaFreniere received approximately \$41,000 in workers' compensation benefits from Dutton's insurer. LaFreniere then pursued a negligence action against Dutton, asserting that the trip was primarily personal and that Dutton was not entitled to invoke the Workers' Compensation Act's exclusivity provision.

PROCEDURAL HISTORY

LaFreniere filed a Superior Court complaint against Dutton and Metropolitan alleging negligent operation of Dutton's vehicle and seeking personal-injury damages. Dutton moved for summary judgment, arguing that LaFreniere's receipt of workers' compensation benefits triggered the Workers' Compensation Act's exclusivity provision. The Superior Court granted summary judgment, and LaFreniere appealed.

DISPOSITION

affirmed

CASES CITED

- Beacon Mutual Insurance Co. v. Spino Brothers, Inc., 11 A.3d 645, 648 (R.I. 2011)
- Sansone v. Morton Machine Works, Inc., 957 A.2d 386, 393 (R.I. 2008)
- National Refrigeration, Inc. v. Travelers Indemnity Co. of America, 947 A.2d 906, 909 (R.I. 2008)
- Moore v. Rhode Island Board of Governors for Higher Education, 18 A.3d 541, 544 (R.I. 2011)
- Berman v. Sitrin, 991 A.2d 1038, 1043 (R.I. 2010)
- Laliberte v. Salum, 503 A.2d 510, 514 (R.I. 1986)
- Manzi v. State, 687 A.2d 461, 462 (R.I. 1997) (mem.)
- Kulawas v. Rhode Island Hospital, 994 A.2d 649, 655 (R.I. 2010)
- Sorenson v. Colibri Corp., 650 A.2d 125, 129 (R.I. 1994)
- DiQuinzio v. Panciera Lease Co., 612 A.2d 40, 42 (R.I. 1992)