

NEW YORK COURT OF APPEALS

Garcia v. Monadnock Constr., Inc.

Garcia, 2026 NY Slip Op 03217 (N.Y. Ct. App. 2026) · No. No. 26 · Decided May 21, 2026

SUMMARY

The New York Court of Appeals affirmed an Appellate Division order holding that the Justice For Injured Workers Act prohibits courts from giving collateral estoppel effect to Workers' Compensation Board decisions in pending or future lawsuits, except as to the existence of an employer-employee relationship. The court held that applying the statute after its effective date to a workers' compensation decision issued before that date was a prospective application, not a retroactive one.

CASE DETAILS

COURT	New York Court of Appeals
WRITING FOR THE COURT	Chief Judge Wilson; Judge Rivera; Judge Garcia; Judge Singas; Judge Cannataro; Judge Troutman; Judge Halligan
JURISDICTION	New York Court of Appeals
DECIDED	May 21, 2026
DOCKET	No. 26
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an Appellate Division order reversing Supreme Court's grant of defendants' motion to amend their answer to assert collateral estoppel and for partial summary judgment; the Court of Appeals affirmed and answered the certified question in the affirmative.
STANDARD OF REVIEW	De novo review of the legal question whether the Justice For Injured Workers Act barred collateral-estoppel effect from being given to the prior Workers' Compensation Board determination.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Monadnock Construction, Inc. et al. v. Waldy Quinones Garcia

TOPICS

- construction law
- statutory interpretation
- affirmative defenses
- summary judgment
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the Justice For Injured Workers Act prohibited Supreme Court from giving collateral-estoppel effect to a Workers' Compensation Board determination issued before the statute's effective date.
2. Whether applying the Justice For Injured Workers Act after its effective date to a pending action involving an earlier Workers' Compensation Board determination constituted retroactive application.

HOLDINGS

1. The Justice For Injured Workers Act, as of its effective date, prohibits courts from giving collateral-estoppel effect in another action arising from the same occurrence to a Workers' Compensation Board determination, except for a determination concerning the existence of an employer-employee relationship.
2. Applying the Justice For Injured Workers Act after its effective date to pre-effective-date Workers' Compensation Board decisions in pending or future lawsuits is not retroactive where the application does not impair a previously possessed right, increase liability for past conduct, or impose new duties concerning completed transactions.

KEY QUOTATIONS

“shall not be given collateral estoppel effect in any other action or proceeding arising out of the same occurrence, other than the determination of the existence of an employer employee relationship” ([*1])

“A statute has retroactive effect . . . if it would impair rights a party possessed when [they] acted, increase a party's liability for past conduct, or impose new duties with respect to transactions already completed” ([*1])

“As of its effective date of December 30, 2022, courts are prohibited from giving collateral estoppel effect to workers' compensation decisions in pending or future lawsuits, except as to the existence of an employer-employee relationship.” ([*1])

FACTUAL BACKGROUND

Plaintiff was injured in 2020 while working at a construction site and pursued both a workers' compensation claim and a personal injury action alleging negligence and Labor Law violations. In 2021, the Workers' Compensation Board determined that he had not sustained causally related injuries. After the Justice For Injured Workers Act took effect on December 30, 2022, defendants sought to use the Board's determination for collateral-estoppel purposes, and Supreme Court granted the motion in July 2023.

PROCEDURAL HISTORY

After the Workers' Compensation Board determined in 2021 that plaintiff did not sustain causally related injuries, defendants moved in the personal injury action to amend their answer to assert collateral estoppel and for partial summary judgment. Supreme Court granted the motion in July 2023. The Appellate Division reversed, concluding that the Justice For Injured Workers Act applied retroactively. The Court of Appeals affirmed, but

held that application of the statute was prospective rather than retroactive because the statute was in effect when Supreme Court ruled.

DISPOSITION

affirmed

CASES CITED

- Matter of Gleason [Michael Vee, Ltd.], 96 NY2d 117, 122
- American Economy Ins. Co. v. State of New York, 30 NY3d 136, 147
- Gottwald v. Sebert, 40 NY3d 240, 258
- Landgraf v. USI Film Products, 511 U.S. 244, 269

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