

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Carolyn Edwards v. Target Corporation

Civil Action No. 23-11937 (E.D. Mich. Jan. 30, 2026) · No. 23-11937 · Decided January 30, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan granted Target Corporation’s motion for summary judgment in a slip-and-fall action brought by Carolyn Edwards. The court held that Edwards failed to present evidence that Target had actual or constructive notice of the water on the floor and also rejected her gross negligence and nuisance claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	David R. Grand
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	January 30, 2026
DOCKET	23-11937
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on plaintiff's premises liability, gross negligence, and nuisance claims arising from a slip-and-fall. The court granted summary judgment for defendant and denied or denied as moot the other pending motions.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 56, summary judgment is appropriate when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court views the evidence and reasonable inferences in the light most favorable to the nonmoving party, but the nonmoving party must identify specific evidence establishing a triable issue and may not rely on pleadings or conclusory assertions.
PRECEDENTIAL VALUE	unpublished_nonprecedential
PARTIES	Carolyn Edwards v. Target Corporation

TOPICS

summary judgment

premises liability

negligence

nuisance

civil procedure

PRACTICE AREAS

Civil procedure

Premises liability

Negligence

Nuisance

QUESTIONS PRESENTED

1. Whether Target was entitled to summary judgment on Edwards's premises liability claim because Edwards lacked evidence that Target had actual or constructive notice of the water before her fall.
2. Whether Target was entitled to summary judgment on Edwards's gross negligence claim because the evidence did not establish that Target knew of or created a dangerous condition or otherwise acted with gross negligence.
3. Whether Edwards could maintain public or private nuisance claims based on the water on Target's floor.
4. Whether Edwards's later filings and motions warranted denial of summary judgment, compelled production of video footage, or otherwise affected the disposition.

HOLDINGS

1. A premises-liability plaintiff must establish that the landowner had actual or constructive notice of the dangerous condition before the injury. Because Edwards presented no evidence that Target had actual or constructive notice of the water before her fall, she failed to establish a genuine dispute on breach and Target was entitled to summary judgment.
2. Assuming Michigan recognizes an independent common-law claim for gross negligence of the type asserted, Edwards's claim fails because she presented no evidence that Target knew of or created a dangerous condition or otherwise omitted ordinary care in circumstances where serious harm was apparent.
3. Edwards could not establish a public nuisance because she presented no evidence that the water on Target's floor significantly interfered with the public's health, safety, peace, comfort, or convenience, or otherwise constituted an unreasonable interference with a public right.
4. Edwards could not maintain a private nuisance claim because she did not allege or show a nontrespassory invasion of her interest in the private use and enjoyment of land.

KEY QUOTATIONS

"Thus, Target is entitled to summary judgment on Edwards' premises liability claim." (Premises Liability Claim section)

"Target is therefore entitled to summary judgment on Edwards' gross negligence claim." (Gross Negligence Claim section)

"Thus, Target is entitled to summary judgment on Edwards' nuisance claim." (Nuisance Claim section)

"For all of the foregoing reasons, IT IS ORDERED that Target's Motion for Summary Judgment (ECF No. 62) is GRANTED." (Conclusion)

FACTUAL BACKGROUND

On December 18, 2020, Carolyn Edwards slipped and fell on water near the entrance of a Target store in Clinton Township, Michigan, while walking from carpet onto a linoleum floor. She testified that she did not see the water until after she fell, could not say how long it had been on the floor or where it came from, and did not know whether anyone had previously fallen on it. A Target security guard assisted Edwards after the fall and placed a wet-floor sign in the area, but Edwards presented no evidence that Target knew or should have known of the water before the accident.

PROCEDURAL HISTORY

Edwards filed suit against Target after slipping on water near the entrance of a Target store. The case proceeded through discovery, and Edwards's counsel was eventually permitted to withdraw. Target moved for summary judgment, the parties briefed the motion, and the court held oral argument. The court granted summary judgment on all claims, denied Edwards's motions, denied Target's motion to strike as moot, and denied Target's earlier motion to dismiss as moot.

DISPOSITION

other

CASES CITED

- Pittman v. Cuyahoga Cty. Dep't of Children & Family Servs., 640 F.3d 716, 723 (6th Cir. 2011)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Ciminillo v. Streicher, 434 F.3d 461, 464 (6th Cir. 2006)
- Celotex Corp. v. Catrett, 477 U.S. 317, 325 (1986)
- Alexander v. CareSource, 576 F.3d 551, 558, 560 (6th Cir. 2009)
- Wrench LLC v. Taco Bell Corp., 256 F.3d 446, 453 (6th Cir. 2001)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 587 (1986)
- Street v. J.C. Bradford & Co., 886 F.2d 1472, 1479 (6th Cir. 1989)
- Everson v. Leis, 556 F.3d 484, 496 (6th Cir. 2009)
- Lewis v. Philip Morris, Inc., 355 F.3d 515, 533 (6th Cir. 2004)
- Kandil-Elsayed v. F & E Oil, Inc., 512 Mich. 95, 110-12 (2023)
- Lowrey v. LMPS & LMPJ, Inc., 500 Mich. 1, 3, 8, 10 (2016)
- Karamol v. Meijer, Inc., No. 366540, 2024 WL 3466377, at *3 (Mich. Ct. App. July 18, 2024)
- Darnell v. Wal-Mart Stores, Inc., No. 359970, 2023 WL 2052180, at *3 (Mich. Ct. App. Feb. 16, 2023)
- Whitmore v. Sears, Roebuck & Co., 89 Mich. App. 3, 9 (1979)
- Gleason v. Target Corp., No. 23-11337, 2024 WL 4864177, at *3-4 (E.D. Mich. Nov. 21, 2024)
- Johnson v. Williams, No. 15-13856, 2017 WL 4236548, at *16 (E.D. Mich. Sept. 25, 2017)
- Adkins v. Thomas Solvent Co., 440 Mich. 293, 302 (1992)
- Hawthorne v. Wal-Mart Stores East, LP, No. 18-12628, 2021 WL 2986205, at *3 (E.D. Mich. July 15, 2021)

- Sholberg v. Truman, 496 Mich. 1, 6 (2014)
- Cloverleaf Car Co. v. Phillips Petroleum Co., 213 Mich. App. 186, 190 (1995)
- Marble v. Dobson, No. 204535, 1998 WL 1989918, at *1 n.1 (Mich. Ct. App. Sept. 18, 1998)

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