

Case Name: CSX Transportation, Inc. v. Collins

Date Decided: November 5th, 2010

Originally Filed in: Kentucky (state)

Decided by: Kentucky Court of Appeals (State)

Court: Ky. App.

Judge: Clayton

Citation: 2010 WL 4366296 (Ky. App. 2010)

Background:

Plaintiff, a railroad worker, brought this action against his employer, CSX Transportation ("CSX"), pursuant to the Federal Employers' Liability Act ("FELA"). Plaintiff asserted that he had developed bilateral osteoarthritis as a result of CSX's failure to provide a reasonably safe place to work. The trial court found for the plaintiff, and entered a final judgment that CSX was liable for the Plaintiff's injuries. CSX appealed the decision. CSX asserted that the trial court erred when it failed to instruct the jury on proximate cause. Specifically, CSX argued that the FELA was drafted to be consistent with the common law concept of negligence.

Issue:

Was FELA drafted to be consistent with the common law concept of negligence, thereby requiring the plaintiff to prove that the defendant's negligence was the proximate cause of the plaintiff's injuries?

Overall Issues Discussed or Touched Upon in this Case:

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Held:

No, the court held that the common law concept of negligence does not apply to FELA claims. The court reasoned that Congress "has deliberately adopted a negligence standard different from that of the common law."

Comments:

In FELA cases, the plaintiff is not required to prove that the defendant's negligence was the proximate cause of his injuries to recover.