

Summary of SC100659, Joe David Hudson v. Joplin Regional Stockyards Inc.

Appeal from the Jasper County circuit court, Judge Gayle Crane

Argued and submitted December 4, 2024; opinion issued December 23, 2024

Attorneys: JRS was represented by Amanda D. Cooper, D. Dean Kirk II and Brian D. Moody of Kutak Rock LLP in Springfield, (417) 720-1410. Hudson was represented by David F. Sullivan of Schmidt, Kirby & Sullivan PC in Springfield, (417) 882-2828.

This summary is not part of the opinion of the Court. It is provided by communications counsel for the convenience of the reader. It neither has been reviewed nor approved by the Supreme Court and should not be quoted or cited.

Overview: An employer appeals the circuit court’s order reviving a prior judgment arising from a workers’ compensation case and overruling the employer’s motion for relief from the prior judgment. In a unanimous decision written by Judge Zel M. Fischer, the Supreme Court of Missouri reverses the circuit court’s order. Because the employer has paid the entire lump sum due under the judgment, the circuit court erred in finding the judgment had not been satisfied.

Facts: While working for Joplin Regional Stockyards Inc. (JRS) in 2002, Joe David Hudson seriously injured his left leg. Three years later, he settled a workers’ compensation claim against JRS and its insurance company, which together agreed to pay Hudson an \$80,000 lump sum. The settlement expressly left open future medical expenses for Hudson’s left ankle problems directly related to his injury. In August 2011, doctors amputated Hudson’s left leg below the knee. JRS’ insurance company refused to pay for the procedure. Hudson then filed the settlement in the circuit court, which entered its judgment in accordance with the settlement agreement against JRS. JRS’ insurance company then paid Hudson’s outstanding medical bills, including those related to the amputation. Hudson later entered into a subordination agreement in which he stipulated, in part, that he had been paid the full lump sum specified under the settlement. In August 2022, Hudson filed a motion to revive the circuit court’s prior judgment. JRS opposed the motion and filed a separate motion seeking relief from the judgment. The circuit court found the parties had not yet satisfied the judgment, sustained Hudson’s motion to revive the judgment and overruled JRS’ motion for relief. JRS appeals.

REVERSED.

Court en banc holds: (1) JRS has standing (legal ability) to appeal the circuit court’s order reviving the prior judgment because it is aggrieved by that order. A lien attaches to JRS’ property until the judgment is satisfied. The revival order – which suggests JRS owes more than the judgment amount – creates a new obligation under the settlement, thereby infringing on JRS’ right to be free from the judgment lien.

(2) The circuit court improperly found the workers’ compensation judgment had not been satisfied. Hudson and JRS entered into a partial workers’ compensation settlement under section 287.390, RSMo. That settlement obligated JRS to pay Hudson only \$80,000 for the issues the workers’ compensation division had determined, but it expressly left “open” JRS’ monetary obligations to Hudson for “future medical” expenses for “left ankle problems directly related to his injury.” Under state law, the workers’ compensation division retains authority to determine

an employee's "open" claim for benefits for future medical care. Given the language of the settlement agreement, the prior judgment was satisfied when JRS paid the only amount due under the settlement – the \$80,000 lump sum. Pursuant to Rule 84.14, this Court enters an order overruling Hudson's motion to revive the judgment.

(3) JRS' appeal is partially successful and, by definition, cannot be frivolous. Accordingly, this Court overrules Hudson's motion for damages for a frivolous appeal.