STATE OF MAINE

SUPREME JUDICIAL COURT

SITTING AS THE LAW COURT

LAW COURT DOCKET NO. SOM-25-264

AMY B. BEEM.

Plaintiff-Appellant,

v.

NANCY M. TEMPLE

Defendant-Appellee.

On Appeal from the Superior Court
Civil Docket
Somerset County

BRIEF OF APPELLANT, AMY B. BEEM

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I. STATEMENT OF FACTS

Plaintiff-Appellant Amy B. Beem (*hereinafter* "Appellant") appeals the Superior Court's (Somerset County, *Mullen, J.*) order granting summary judgment in favor of Defendant-Appellee Nancy M. Temple (*hereinafter* "Appellee") on a civil action seeking damages for personal injuries arising from a casualty incident involving a motorized vehicle and a mule. The court granted Appellee's dispositive motion on the basis that Appellant's claims were barred by Maine's "Equine Activities Act" (7 M.R.S. §§ 4101 to -03-A; *hereinafter* "EAA"); otherwise, the trial record contained ". . . numerous disputes of material fact . . . [that] would preclude entry of summary judgment . . . ." (A. 20, ¶ 42.) (*Order on Defendant's Mot. for Summary Judgment*, *Beem v. Temple*, No. CV-23-022, ¶ 42 (Me. Super. Ct., Som. Cnty., May 20, 2025).

On or around August 2, 2022, Appellant was a mule rider on the Devil's Head Road—a dirt road and designated "multiuse trail" in and around St. Albans, Maine. (A. 11, ¶¶ 2-4, 171, ¶¶ 1-3.) Appellant was riding near a friend, who was a saddled rider on a horse. (Id.) As Appellant and her friend rode their equines on the trail, Appellee was operating a utility task vehicle (*hereinafter* "UTV") on the Devil's Head Road, travelling in the same direction as Appellant. (A. 180, ¶ 53, 181, ¶ 53.) Appellee approached Appellant from behind, at a higher rate of speed than the equines. (A. 180, ¶ 53, 181, ¶ 53.) The degree of speed and the UTV operator's actions at the time of the incident are disputed. (A. 172, ¶ 9, 181, ¶58.)

Appellant and her friend heard Appellee's UTV approaching and reined their equines to the sides of the Devil's Head Road—one on the left, one on the right—where they remained stationary, facing oncoming traffic, to allow safe passage of the UTV. (A. 181, ¶¶ 54, 57.)

The parties agree that Appellee lost control of her UTV and crashed on the side of the road, flipping over, near Appellant. (A. 174, ¶ 17, 182, ¶ 67.)

In response to the crash, Appellant's mule bolted from its stationary position. Appellant was thrown from her saddle and sustained serious personal injuries. (A. 182, ¶ 68, ¶ 75; 183, ¶ 80.)

Appellant brought civil claims against Appellee for damages, and following a motion for summary judgment, the Superior Court issued an Order dismissing the case on the grounds that the EAA barred Appellant's claims. (A. 14-20, ¶¶ 16-39.) Specifically, the court held that: the Act barred the claim by limiting recovery "from any person"; Appellant assumed a statutorily- defined risk; and Appellee was a "spectator" engaged in "equine activity" while operating a UTV. (A. 14-20, ¶¶ 28-29, 34.)

I. STATEMENT OF LEGAL ISSUES ON REPORT

The sole issue on appeal is

> Whether the immunity provisions of the 'Equine Activities Act' bar Appellant's negligence claim.

II. SUMMARY OF ARGUMENT

The trial court's order granting summary judgment misconstrues and misapplies the EAA and related precedent. In applying the EAA, the trial court failed to properly interpret the plain language and definitions contained therein—none of which immunize negligent or reckless motorists. Equines occasionally encounter motorists in Maine; if the Legislature had intended for the EAA to immunize motorists from liability when one party is engaged in "equine activity" it would have been explicit.

The trial court's order fails to consider the principle that statutes in derogation of the common law must be strictly construed. Plainly, the negligent or reckless operation of a UTV—or any motorized vehicle—is not an inherent risk of equine activity. The trial court's failure to use an appropriate canon for construction—*ejusdem generis*—contributed to a decision that works "absurdities" in application.

In dismissing Appellant's action, the trial court misapplied the EAA's "assumption of risk" provision. The plain language of the EAA does not confer blanket immunity because one party was engaged in equine activity. Instead, it enumerates a limited set of circumstances under which an injured person *may assert claims* for damages against an equine professional. The trial court's misapplication is highlighted by competing findings: first, that Appellee was a "spectator" of

"equine activity," but second, that Appellee is not "any other person" within the meaning of the Act.

The trial court's order also misapplies relevant precedent (*McCandless v. Ramsey*). In its order, the court points to *McCandless* as authority for defining "equine activity" as a matter of law, not fact. This misunderstands the precedent. In fact, *McCandless* stands for the proposition that legislative history is an integral factor in interpreting Maine's EAA and, further, that the legislative history of the EAA supports the conclusion that it was enacted to immunize operators of horse-related businesses from common, regular, and expected risks associated with the business of equine care. In short, the EAA was passed to curtail liability arising from what the Legislature perceived as inherent risks of equine activity that are impracticable or impossible to eliminate when *equine nature* is the inciting act—and certainly not due to negligent or reckless operation of a motor vehicle.

III. **STANDARD OF REVIEW**

The Court reviews the grant of summary judgment *de novo*, taking the evidence in the light most favorable to the party against whom judgment was entered. *Dyer v. Dep't of Transp.*, 2008 ME 106, ¶ 14, 951 A.2d 821, 825 (citing *Stanley v. Hancock County Comm'rs,* 2004 ME 157, ¶ 13, 864 A.2d 169, 174). "Absent a dispute of material fact, whether or not [statutory immunities apply] is a question of law that we review *de novo*." *Klein v. Univ. of Maine Sys.*, 2022 ME 17,

¶ 6, 271 A.3d 777, 780 (citing *McDonald v. City of Portland*, 2020 ME 119, ¶ 2, 239 A.3d 662).

When reviewing a trial court's statutory construction, the Court applies the same *de novo* standard ". . . by first examining the plain meaning of the statute within the context of the whole statutory scheme to give effect to the Legislature's intent." *Baker v. Farrand*, 2011 ME 91, ¶ 21, 26 A.3d 806, 813–14 (citing *HL 1, LLC v. Riverwalk, LLC*, 2011 ME 29, ¶ 17, 15 A.3d 725, 731; *Dickey v. Vermette*, 2008 ME 179, ¶ 9 n. 2, 960 A.2d 1178, 1180).

IV. **ARGUMENT**

I. The trial court misconstrued the plain language of 7 M.R.S. §§ 4101 to -03-A.

In interpreting a statute, the Court's ". . . single goal is to give effect to the Legislature's intent in enacting the statute." *Dickau v. Vermont Mut. Ins. Co.*, 2014 ME 158, ¶ 19, 107 A.3d 621, 627 (citing *Berube v. Rust Eng'g*, 668 A.2d 875, 877 (Me. 1995). "In determining the Legislature's intent, we look first to the plain language of the statute. In considering the plain language, however, 'we must consider the entire statutory scheme in order to achieve a harmonious result.'" *Klein*, 2022 ME 17, ¶ 7, 271 A.3d 777 (internal citations omitted). "A plain language interpretation should not be confused with a literal interpretation, however. *See Doe*

v. Reg'l Sch. Unit 26, 2014 ME 11, ¶ 15, 86 A.3d 600 ("A court can even ignore the literal meaning of phrases if that meaning thwarts the clear legislative objective").

In construing plain language, the Court gives effect to legislative intent by avoiding absurd, illogical, or inconsistent results. *See State v. Ray*, 2025 ME 29, ¶ 5, 334 A.3d 663, 664–65 (internal citations omitted). In so doing, the Court gives meaning to all words in a statute, and none are to be treated as surplusage if they can be reasonably construed. *Id.*

The pertinent statute underlying the instant matter—the EAA—reads:

> **1. Liability.** Except as provided in subsection 2, an equine activity sponsor, an equine professional or any other person engaged in an equine activity is not liable for any property damage or damages arising from the personal injury or death of a participant or spectator resulting from the inherent risks of equine activities. Except as provided in subsection 2, a person may not make any claim or recover from any person for any property damage or damages for personal injury or death resulting from the inherent risks of equine activities. Each participant and spectator in an equine activity expressly assumes the risk and legal responsibility for any property damage or damages arising from personal injury or death that results from the inherent risk of equine activities. Each participant has the sole responsibility for knowing the range of that person's ability to manage, care for and control a particular equine or perform a particular equine activity. It is the duty of each participant to act within the limits of the participant's own ability, to maintain reasonable control of the particular equine at all times while participating in an equine activity, to heed all warnings and to refrain from acting in a manner that may cause or contribute to the injury of any person or damage to property.

7 M.R.S. § 4103-A(1).

Subsection two, in pertinent part, provides:

> **2. Exceptions; participants.** Nothing in subsection 1 prevents or limits the liability of an equine activity sponsor, an equine professional or any other person engaged in an equine activity, if the equine activity sponsor, equine professional or person:
>
> . . .
>
> C. Commits an act or omission that constitutes reckless disregard for the safety of others and that act or omission caused the injury. For the purposes of this section, "reckless" has the same meaning as "recklessly," defined in Title 17-A, section 35, subsection 3, paragraph A . . . .

Id. § 4103-A(2)(C).

The EAA defines "inherent risk of equine activities" as follows:

> **7-A. Inherent risks of equine activities.** "Inherent risks of equine activities" means those dangers and conditions that are an integral part of equine activities, including, but not limited to:
>
> A. The propensity of an equine to behave in ways that may result in damages to property or injury, harm or death to persons on or around the equine. Such equine behavior includes, but is not limited to, bucking, shying, kicking, running, biting, stumbling, rearing, falling and stepping on;
>
> B. The unpredictability of an equine's reaction to such things as sounds, sudden movements and unfamiliar objects, persons or other animals;
>
> . . . .

Id. § 4101-A(7-A)(A-B).

Appellee's operation of the UTV was not an inherent risk of equine activity.

Appellee's actions were not unpredictable or erratic. They were reckless and negligent—a critical distinction. Given Appellee's actions in choosing how to operate her UTV, only she caused the resulting incident. If the Legislature had

intended to immunize reckless and negligent motorized vehicle operators, they would have done so.

Maine has long followed the precedent set in *Henry v. Brown* that physical contact is not required for liability to attach in cases involving "animals not wild." 495 A.2d 324, 325-26 (Me. 1985). The instant case is important because motorized vehicles (e.g. UTVs, snowmobiles, automobiles, etc.) that encounter equines must always exercise due care under the circumstances. By one example, in some parts of Maine, Amish communities rely on horse-drawn carriages for transportation and share the roadway with motorized traffic.

Distinguishing what fact patterns would allow immunity and what would not allow immunity is illustrative. For example, merely driving past a horse with a rider, or a horse-drawn carriage is, of course, not negligence. However, "revving" one's engine intentionally to startle an equine *would* give rise to a triable factual issue on the basis that a motorist's intentional engine revving is not an inherent risk of equine activity.

Other common examples clearly outside of the ambit of the EAA include physically crashing into an equine (not an inherent risk of equine activity), or sliding off an icy road into an equine standing on the shoulder (not a named inherent risk).

The trial court in the instant matter misconstrued the EAA by concluding that Appellant's status as a mounted rider in close proximity to Appellee's UTV crash

was an inherent risk of equine activity. Concurrently, the trial court concluded that Appellee was a "spectator" of equine activity whilst crashing her UTV. This interpretation should be deemed an incorrect application of the plain language of the statute.

In disposing of Appellant's claims, the trial court said that its interpretation of the Act did not risk an "absurd result." *See Order on Defendant's Mot. for Summary Judgment*, *Beem v. Temple*, No. CV-23-022, ¶ 37 (Me. Super. Ct., Som. Cnty., May 20, 2025). Although the court appropriately concludes that "[a] negligently driven vehicle colliding with a [horse-drawn] cart is not among the enumerated 'inherent risks of equine activities,' and the injured person's claim would therefore not be barred by the Equine Activities Act," it fails to fairly extend its logic. Stated simply, the court's recognition that claims arising from a vehicle-against-horse cart incident *would be permissible* under the Act, but claims arising from a UTV-against-horse incident *are not permissible*, is logically inconsistent. The distinction is decidedly fact-laden and intimately tied to the question of proximate cause; it is therefore inappropriate for disposition on summary judgment.

Despite §4103-A(4)(B)'s clear language giving immunity to activities "designed or intended by an activity sponsor," the court's interpretation of the EAA expands the plain language to include virtually *any* rider for the purposes of

immunity. This contradicts the plain language of the Act that expressly limits immunity to those who host or facilitate equine activities.

The court also found that Appellee was a "spectator" of equine activity as she operated her UTV. Not only is this factually incorrect, but the court stretched beyond the plain language of the EAA to make the finding. Nothing in the EAA immunizes motorists who negligently crash their vehicles in the presence of equines.

By another example, as discussed *infra*, the "absurd results" flowing from the trial court's interpretation are laid bare; under the trial court's interpretation, the EAA would immunize a negligently flown aircraft that crashes into a stadium of riders participating in (and spectators watching) a horse race, so long as damages to riders and spectators resulted from horse-thrown injuries. *See infra Gibson v. Donahue*, 2002-Ohio-194, 148 Ohio App. 3d 139, 772 N.E.2d 646. This result is clearly outside the scope and purpose of the EAA, which is plainly written to apply to equine activity sponsors and their spectators who are actively engaged in professional equine activities.

II. Common law negligence should apply—not legislative preemption—under a narrow construction of the EAA.

Even assuming, *arguendo*, the Court accepts the trial court's finding that Appellee was a *spectator* of equine activity while operating her UTV, the EAA

cannot abrogate the common law entirely. Pursuant to § 4103-A(1), the EAA limits liability only for "inherent risks of equine activities"—not novel external risks.

Here, a third-party UTV operator—without evidence of intent to participate in or avail herself to "equine activity"—negligently failed to maintain control of her vehicle, crashed, and in so doing created a sudden, unnatural risk. That sudden, unnatural risk is *not* an inherent risk of riding horses or mules. Appellant's driving behavior is categorically absent from the plain language of § 4101(7-A).

The instant case is not one in which a horse (or mule) was frightened by a creature crossing a field, or an approaching thunderstorm. The trial court's construction of the EAA is decidedly *broad* in this regard, and travels from the plain language of the EAA. In so doing, it derogates the common law negligence claims available to Appellant.

"When the Legislature enacts a statute in derogation of the common law, the statute must be clear and unambiguous in its effect; 'the common law is not to be changed by doubtful implication . . . [and] a statute in derogation of it will not affect a change thereof beyond that clearly indicated either by express terms or by necessary implication.'" *State Farm Mut. Auto. Ins. Co. v. Koshy*, 2010 ME 44, ¶ 30, 995 A.2d 651, 662 (citing *Batchelder v. Realty Res. Hospitality, LLC,* 2007 ME 17, ¶ 23, 914 A.2d 1116, 1124). For this reason, the Court strictly interprets a statute that

runs counter to established common law principles. *See id.* Nowhere in the EAA are negligently-operated motorized vehicles designated as an "inherent risk" of equine activity—not explicitly, nor impliedly.

Over 40 jurisdictions have similar statutes that limit liability for injuries sustained in connection with equine activities. *See Order on Defendant's Mot. for Summary Judgment*, *Beem v. Temple*, No. CV-23-022, ¶ 22 (Me. Super. Ct., Som. Cnty., May 20, 2025). Though merely persuasive in this Court's analysis, the conditions under which other jurisdictions with similar statutes to Maine's EAA have construed their respective acts to limit liability are enlightening.

Ohio, like Maine, employs an equine liability statute. In *Gibson v. Donahue*, an Ohio plaintiff brought suit against the owner of two dogs that caused the plaintiff's horse to startle and buck her into a tree. 2002-Ohio-194, ¶ 3, 148 Ohio App. 3d 139, 142, 772 N.E.2d 646, 648. The defendant dog-owner argued that Ohio's Equine Activity Liability Act shielded her from liability. The Court disagreed and ruled that the Ohio equine activity statute did not apply to shield the defendant because the plaintiff—riding her own horse in a non-sponsored outing—was ***not*** engaged in "equine activity" at the time of her injuries under the definition thereof. *Id.* ¶ 22.

Gibson is illustrative and persuasive. In *Gibson*, the Court addressed the very argument that Appellee makes in the instant case: whether the language of the equine activity act could be so broadly interpreted as to immunize "anyone"—specifically the same "any other person" language. *Id.* ¶ 23. The Court reasoned that applying defendant's interpretation and granting immunity to the dog owner would necessarily mean that "[a] person who negligently crashes an airplane into the crowd at an equine event would thus be immune from liability, at least for injuries to thrown riders, as would someone who lets his or her dog run out in the middle of a steeplechase." *Id.* ¶ 25. Seeking to avoid this absurd result, the Court applied the principle of *ejusdem generis* and interpreted the words "any other person" as being of like kind to the more limited class of equine activity participants and equine professionals. *Id.* ¶ 26.

This Court has historically acknowledged harmonizing narrow statutory construction with application of *ejusdem generis*. *Badler v. Univ. of Maine Sys.*, 2022 ME 40, ¶¶ 6-7, 277 A.3d 379, 381 (citing *New Orleans Tanker*, 1999 ME 67, ¶ 7, 728 A.2d 673). Because the EAA derogates the common law, such an approach is warranted. Applying this principle, the language of the EAA very clearly does not contemplate, suggest, or outright identify motorists as belonging to any class enjoying potential immunity.

III. The 'Assumption of Risk' provisions of the Maine EAA do not bar all common law negligence claims.

Maine's EAA does not confer absolute immunity on the basis that a plaintiff accepted risks inherent in equine activities. Oppositely, the EAA enumerates only a limited set of circumstances under which an injured person may assert claims for damages against an equine professional: actual knowledge of inherent risk; proclamation of sufficient knowledge of experience to be on notice thereof; or noticed received of inherent risks and limitations of liability. 7 M.R.S. § 4103-A(3)(A-C). Conspicuously, the Maine EAA does *not* shield defendants from liability where their actions constitute reckless disregard for the safety of others or negligence. See 7 M.R.S. § 4103-A(2)(C).

The trial court draws a factual determination inappropriate for the summary judgment window in determining that no evidence exists in the record to support a finding of reckless conduct on behalf of Appellant. *See Order on Defendant's Mot. for Summary Judgment*, *Beem v. Temple*, No. CV-23-022, ¶ 31 n. 5 (Me. Super. Ct., Som. Cnty., May 20, 2025). To the contrary, there is ample evidence in the trial record and instant Appendix—specifically, Appellee's deposition transcript detailing the facts of the incident such as skidding, crashing, and flipping the UTV (all indicating that Appellee was travelling at excessive speed) and photos of the crash scene. Notwithstanding M.R. Civ. P. 8(a)(1)'s liberal pleading standard in

furtherance of Appellant's claim, the plain language of the EAA endorses proceeding on this negligence action.

Pursuant to the trial court's broad interpretation of "any other person," § 4103-A(2)(C) applies to Appellee. As applied, § 4103-A(2)(C) excepts from immunity "any other person engaged in equine activity" whose acts or omissions constitute reckless disregard for the safety of others and cause injury. Because the trial court defined Appellee as a "spectator" of Appellant's equine activity, it defies logic to declare Appellee as falling outside of equine activity. For, assuming *arguendo* that Appellee could rightfully be defined as a spectator—but not of equine activity—than of what equine activity can she be said to have been spectating? If she was spectating Appellant's equine, she should have never crashed her UTV.

The plain answer is that Appellee cannot rationally be designated both a "spectator" of "equine activity" and simultaneously untethered to "equine activity." If the immunizing language of the EAA is construed as inoculating Appellee on the basis that she was "in the vicinity of an equine activity but who is not a participant," then the exceptions provided by § 4103-A(2) simply cannot apply.

IV. The trial court's order misapplies *McCandless*.

The trial court's order cites *McCandless v. Ramsey* in concluding that whether Appellant's injuries arose from the inherent risks of equine activities is a matter of

law, not fact, and therefore amenable to summary judgment. 2019 ME 111, 211 A.3d 1157; *See Order on Defendant's Mot. for Summary Judgment*, *Beem v. Temple*, No. CV-23-022, ¶ 30 (Me. Super. Ct., Som. Cnty., May 20, 2025). The trial court points to the *McCandless* Court's determination, as a matter of law, that the plaintiff's injuries resulted from the inherent risks of equine activities " . . . because the statute defined 'inherent risks of equine activities.'" *Id.*

In fact, the *McCandless* Court's determination as a matter of law was borne from both the particularized definition of inherent risks ***and*** the legislative history available "for purposes of interpreting any ambiguity in the statute....." *McCandless*, 2019 ME 111, ¶ 19, 211 A.3d 1157. As the *McCandless* decision illustrates, the Maine EAA does not stand for the proposition that *any* third party, wholly uninvolved in equine activity receives immunity for injuries arising from the same. Quite oppositely, the *McCandless* opinion is clear as to the intent and purpose of the EAA, as illustrated by the Act's legislative history, including testimony and materials from the Maine Equine Advisory Council, Maine Equine Industry Association, the University of Maine, and owners of horses and equine facilities:

> These organizations and individuals urged the committee to recommend the law's passage so that horse owners, and operators of horse-related businesses, could engage in equine activities without risking excessive liability or facing exorbitant, possibly prohibitively expensive, insurance premiums.

McCandless, 2019 ME 111, ¶ 17, 211 A.3d 1157.

The foregoing is the reason the *McCandless* Court held that

> Reading the statute not to provide immunity to the [defendant minor equestrian] in these circumstances would be unreasonable and against the intentions of the Legislature, and we will not construe the statute in such a manner.

Id. ¶ 18.

The purpose of the EAA—as recognized in *McCandless*—is not to convey blanket immunity based upon a broad interpretation of the "any other person" language (as was the trial court's determination), but to ". . . curtail liability for injuries arising from risks that are 'impracticable or impossible to eliminate due to the nature of equines' and to allow reasonable access to insurance for those engaged in horse-related activities." *Id.*

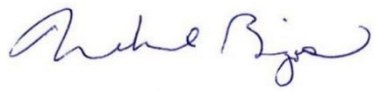
This Court should vacate the trial court's grant of summary judgment because it misinterprets and misapplication the plain language of the EAA.

CONCLUSION

WHEREFORE, Plaintiff-Appellant seeks a ruling from this Court VACATING the Superior Court's Order granting Summary Judgment in favor of Defendant-Appellee, and remanding to the Superior Court for further proceedings.

Respectfully Submitted,

Dated: September 19, 2025



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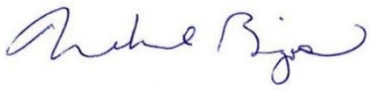

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STATE OF MAINE

SUPREME JUDICIAL COURT
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v.

NANCY M. TEMPLE,
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CERTIFICATE OF SIGNATURE AND COMPLIANCE

I am filing the electronic copy of a brief with this certificate. I will file the paper copies as required by M.R. App. P. 7A. I certify that I have prepared (or participated in preparing) the brief and that the brief and associated documents are filed in good faith, conform to the page or word limits set by the Order of this Court (dated July 7, 2025), and conform to the form and formatting requirements of M.R. App. P. 7A(g).

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