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Idaho Supreme Court
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IN THE SUPREME COURT OF THE STATE OF IDAHO

GALUST BERIAN a single individual; and, JULIA BERIAN, a single individual,	)	
Plaintiffs/Appellants,	)	**Docket Number 47122-2019**
	)	**District Court Number: CV-2017-841**
OVANES BERBERIAN and SOCORRO BERBERIAN, husband and wife,	)	**I.A.R. RULES, 11; 20; 34.1.**
Defendants/Respondents.	)	

APPELLANTS' BRIEF

Appeal from the District Court of the Seventh Judicial District for Jefferson County
Honorable Stevan H. Thompson, District Judge, Presiding

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STATEMENT OF THE CASE AND RELATED PROCEEDINGS

Galust Berian, appellant, is the brother of the respondent, Ovanes Berberian. Julia is the daughter of Galust and the niece of Ovanes. Both Galust and Ovanes are well known Russian artists. Ovanes lives in Jefferson County, Idaho; and, Galust lives in Madison County, Idaho about five miles apart.1 Sorroco is the wife of Ovanes but not actually involved in these proceedings other than the community aspect of Idaho law.2

Galust is handy at wood working and some construction but does not involve these talents as his occupation. He has performed work for his brother, Ovanes, with the assistance of his daughter, Julia. Both of the brothers used to assist one another in various painting matters and as siblings in work matters and usage of implements. Both have nice landscaping at their respective residences.3

These brothers had a parting of the ways and their difference and settlement did not prove productive. The appellants, Berian, filed suit against the respondents, Berberian, for various causes of action.

Those causes of action involved malicious prosecution, invasion of privacy,

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1 R. pp. 192-200, par. 3-4.
2 Id. Par. 6.
3 Id. Par. 31-35.

defamation, intentional and negligent infliction of emotional distress, conversion, breach of contract, unjust enrichment and quantum merit. The district court broke the matter into basically three categories, to-wit: tort, contract law and conversion.4

The court granted Ovanes summary judgment on some but not all of the various counts in the complaint. The majority of the counts were dismissed. Appellants, Berian, requested certification for finality and appealed to this court believing that material issues of fact and/or application of fact to law prohibited summary judgment.5

The district court's ruling will be argued as presented in the decision dated February 11, 2019. 6

STANDARD OF REVIEW

The summary judgment standard of review is well-known by most, if not all, practicing attorneys in the State of Idaho. I.R.C.P., Rule 56(c) states: Summary judgment is only appropriate if "the pleadings, depositions, and admissions on file, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law." If reasonable minds might come to different conclusions summary judgment is inappropriate. *McPheters v. Maile*, 138 Idaho 391, 64 P.3d 317 (2003).

The U.S. Supreme Court case of *Celotex Corp. v Catrett*, 477 U.S. 317; 106 S.Ct. 2548 (1986) has guided courts throughout all jurisdictions on the standard to be used. This case

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4 R. pp. 22-30-complaint
5 R. pp. 293-294.
6 R. pp. 244-256; 295-298.

is well known and is the master guide for all jurisdictions. The standard of *Celotex* for summary judgment is cited in most proceedings.

Idaho has numerous cases on the standard for summary judgment.

> **Summary judgment is appropriate if the pleadings, affidavits, and discovery documents on file with the court, read in the light most favorable to the nonmoving party, demonstrate no material issue of fact such that the moving party is entitled to a judgment as a matter of law. The burden of proving the absence of material facts is upon the moving party. The adverse party, however, "may not rest upon the mere allegations or denials of his pleadings, but his response, by affidavits or as otherwise provided in this rule, must set forth specific facts showing that there is a genuine issue for trial." In other words, the moving party is entitled to a judgment when the nonmoving party fails to make a showing sufficient to establish the existence of an element essential to that party's case on which that party will bear the burden of proof at trial.**

***Baxter v. Craney*, 135 Idaho 166, 170, 16 P.3d 263, 266 (2000).**

The Court should "liberally construe the record in favor of the party opposing the motion for summary judgment, drawing all reasonable inferences and conclusions supported by the record in favor of that party."

On appeal, the same standard is used as was set forth before the lower court. See, *Anderson v. City of Pocatello,* 112 Idaho 176, 731 P.2d 171 (1986); *Friel v. Boise City Hous. Auth.,* 126 Idaho 484, 887 P.2d 29 (1994); *Hilbert v. Hough,* 132 Idaho 203, 969 P.2d 836 (Ct. App. 1998); *Selkirk-Priest Basin Ass"n.* v. *State ex. rel. Batt,* 128 Idaho 831, 919 P.2d 1032 (1996).

Idaho law is very clear on the standard used in summary judgment proceedings that have been cited in numerous cases. That initial standard is as follows:

> **Summary judgment should be granted if no genuine issue as to any material fact is found to exist after the pleadings, depositions, admissions, and affidavits have been construed in a light most favorable to the party opposing**

the summary judgment motion. *Salmon Rivers Sportsman Camps, Inc. v. Cessna Aircraft Co.,* 97 Idaho 348, 544 P.2d 306 (1975).

Thereafter, the court follows often cited points, as follows:

-If the court determines, after a hearing on a motion for summary judgment, that no genuine issues of material fact exist, the court may enter judgment for the parties it deems entitled to prevail as a matter of law. *Barlows, Inc. v. Bannock Cleaning Corp.,* 103 Idaho 310, 647 P.2d 766 (Ct. App. 1982).

-In summary judgment proceedings the facts are to be liberally construed in favor of the party opposing the motion, who is also to be given the benefit of all favorable inferences which might be reasonable drawn from the evidence. *Smith v. Idaho State Federal Credit Union*, 103 Idaho 245, 646 P.2d 1016 (Ct. App. 1982).

-When a party moves for summary judgment, the initial burden of establishing the absence of a genuine issue of material fact rests with that party. *Thompson v. City of Idaho Falls*, 126 Idaho 527, 887 P.2d 1094 (Ct. App. 1994).

- If a genuine issue of material fact remains unresolved, or if the record contains conflicting inferences and if reasonable minds might reach different conclusions from the facts and inferences presented, summary judgment should not be granted. *Sewell v. Neilsen, Monroe, Inc.* 109 Idaho 192, 706 P.2d 81 (Ct. App. 1985).

-If an action will be tried by a court without a jury, a judge is not required to draw inferences in favor of a party opposing a motion for summary judgment. *Kaufman v. Fairchild,* 119 Idaho 859, 810 P.2d 1145 (Ct. App. 1991).

<u>In the instant case a jury has been requested.</u>

Thus, the court has at least two tasks concerning a summary judgment motion. First, the court must determine that no material facts are in dispute. Second, the court must draw reasonable inferences from those <u>non-contested facts</u> to determine which party should be granted summary judgment/partial summary judgment.

ARGUMENT

1. **The analysis by the court was incorrect based upon the facts of this case on the following: malicious prosecution; defamation; intentional and negligent infliction of emotional distress.**

OVERVIEW

The lower court basically divided the summary judgment ruling into three categories dealing with the 1) tort issues; and, 2) then those issues founded in contract or quantum merit and unjust enrichment, 3) leaving the conversion claim and counter-claim.

The complaint on file had four counts containing "sub-claims" in the counts. The court granted summary judgment on counts one through four except the portion on conversion. The district court left viable the final count on conversion and the counter-claim of Respondent.

The district court ruling on summary judgment dated February 8, 2019 is interesting because the respondent admitted, in their answer, to many of the allegations contained in the complaint and not considered by the district court.

Specifically, respondent admitted inviting appellants to his home to return certain items and paintings that both parties were working upon. Ovanes was not at home during one such visit but remained and acted social when the appellants returned a second time only to have law enforcement called and arrested both his brother and niece for unlawful entry. Respondent had previously given permission for their entry! It is interesting that the district court did not consider the answer to the verified complaint on file.7

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7 R. PP. 22-30.

A search warrant was obtained by false information provided by respondent, Ovanes, which caused all of the buildings and landscape, at Appellants' residence, to be searched. Also, noteworthy, the search warrant was issued from Madison County; the arrest occurred in Jefferson County and without probable cause to the prosecutor. (See court's ruling at page 5.) 8

The law enforcement officers did not find any items that were contained in the search warrant except the disputed trailer that was titled in Galust's name. The officers also took the computer and cell phone of Galust which provided nothing.

Appellants, in sworn testimony, disputed the claims of the respondent. Material issues of fact exist which are not contested as to being disputed. <u>This case involves a jury which the court could not make inferences on the facts without the jury.</u>

The complaint of appellants, along with other pleadings, are verified and sworn to as true and accurate. Appellants have gone through every allegation of the <u>verified</u> complaint and also supplemented all of the factual allegations of every paragraph of the complaint in response to the affidavits and pleadings of the respondents. Respondents may disagree with the facts as presented by appellants; but, such facts are material and are in dispute.

The court made rulings based upon legal theories which will be addressed.

<u>THE COURT'S RULING</u>

<u>Malicious Prosecution</u>

The district court begins by citing *Shannahan v. Gigray,* 131 Idaho 664, 667 (1998) to set forth the elements of malicious prosecution as follows:

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8 "It does not appear, however, that there is any evidence that the magistrate found that probable cause existed." R. 244-256 (p. 5 of Decision).

1. **That there was a prosecution;**
2. **That it terminated in favor of the plaintiff (appellant herein);**
3. **That the defendant was the prosecutor;**
4. **Malice;**
5. **Lack of probable cause; and,**
6. **Damages.**

The court acknowledges that elements one and two were met. The court in its decision in footnote one indicated that element three was most likely met. The court then indicated that factual material issues precluded summary judgment on elements four and six.

Thus, the only issue the court brought forth was probable cause. The court cites *Herrold v. Idaho State School for the Deaf and Blind,* 112 Idaho 410,412 (Ct. App. 1987) for the proposition that a finding of probable cause by a magistrate defeats a claim for malicious prosecution.

The court then states: "It does not appear, however, that there is any evidence that the magistrate found that probable cause existed." (page 5 of court decision cited above). Hence, summary judgment in favor of the respondents should be defeated after such reasoning.

The court then goes on to state via *Allen v. Moyle,* 84 Idaho 18, 24 (1961) that malicious prosecution is not a cause of action if given under sound advice from an attorney. The court states that the prosecutor filed charges that were later dismissed would defeat malicious prosecution. The question, unanswered, is if malice and hatred exist what prevents a lie or mistruths by a complainant that the

prosecutor later learns about and then dismisses the action. No statements were provided by the appellant to allow the prosecutor to determine any form of prosecution was warranted. Quite the contrary, the prosecutor dismissed the action.

Furthermore, the court states at page 6 of its decision, "Additionally, the prosecutor applied for and received a search warrant based on the information that he possessed, which would have required a showing of probable cause. The fact that the prosecutor independently pursued the case and the fact that the prosecutor received a search warrant indicated that probable cause for the arrest existed in this case" <u>This statement by the court is incorrect.</u> The search warrant was issued from Madison County. The Jefferson County prosecutor did not have this information nor have any finding of probable cause for a search warrant in another county that produced nothing. The charges issued were from Jefferson County wherein the district court already stated that no probable cause was reviewed by the magistrate. (Page 5 of decision cited previously).

What the court did not consider was the appellants were invited to the residence of the respondents. Thus, the officer's arrest was invalid and probable cause could not have existed. The declaration of Appellants clearly sets forth the fact of invitation. This sworn testimony clearly creates a material fact of issue. The appellant, Berian, stated in response to the sworn statement of Ovanes, by paragraph of respondent, while under oath, as follows:

In paragraph 12, <u>I was at my brother's property location with his permission</u>. My daughter was also present. No property was stolen. The residence of Ovanes was open to students and other individuals.
In paragraph 13, the defendant, Ovanes, <u>blatantly lied on the fact of myself and</u>

daughter being in lawful permission to be on the Ovanes property. The blatant lie that we were not allowed was given to police and was a false statement. . .
I was given permission, along with my daughter, to enter the premises of Ovanes at all times pertinent to the allegations contained in the pleadings on Complaint and stand by those sworn statements.
Nothing was ever stolen from Ovanes by me or my daughter. The claims of Ovanes are without merit and the facts bear out this truth. He has provided nothing to this court that indicates anything was stolen except innuendo.9

The foregoing information from Ovanes was supplied to Madison County for a search warrant and not Jefferson County for charges.

The appellants were arrested in Jefferson County without the information from the Madison County search warrant that was not fruitful and given under false information by respondent. Nothing was obtained in the search warrant that supported the claims of respondent.

Furthermore, there would be no basis for a search warrant of the appellants' dwelling and surrounding outbuildings. (See paragraphs 9, 11-14 of the Answer to the sworn complaint of Appellants; Affidavit of Berian, par. 14-17).10 Material facts precluded the court from determining that probable cause existed via the law enforcement agency. Appellants clearly indicate that they were invited to the residence of the respondent. Material facts need to be determined by a fact-finder, to-wit: the jury. Without the resolution of facts, the district court could not make inferences that probable cause existed if the appellants were lawfully at the residence of the respondent.11

In paragraph 14, Ovanes admits the paragraph regarding the arrest; and is not being truthful to law enforcement that he did not request the arrest. I disagree with his statements in his answer to this paragraph.
This paragraph number 15 is a factual disagreement between me, daughter and the

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9 R. pp. 192-200. (See also sworn complaint, par. 9-12: R. 10-21).
10 Id.
11 See footnotes 9 and 10 above.

defendant, Ovanes Berberian. Paragraphs 16-18 are for the fact finder to determine. (Appellants response paragraphs 12-13).

Telling mistruths or outright lies does not trigger any judicial privilege. The defendants have cited no authority for the proposition that a person may give false information to law enforcement and such false information is privileged. Calling another person, a thief is "per se" negligence if not supported by truth. The defendants recognize the per se language in their initial trial briefing. (See, p. 9 of their trial brief.)12

In sum, if appellants were lawfully at respondents' residence, then no probable cause could have existed to either request a search warrant or issue an arrest. The incident did not occur in the law enforcement officers' presence. (See, *State of Idaho v. Clarke,* Docket No. 45062, (June 12, 2019). It was an unlawful arrest promulgated by the respondent, Ovanes.

Defamation

The district court then relies on a California case *Hagberg v. California Federal Bank,* 81 P.3d 244 (2004) since no case law exists in Idaho. The court used this case to indicate that statements to police officers fall under the judicial privilege exception. The fallacy of this statement is that a citizen is not under oath in making statements to police officers and the statements could be based upon mistruths. That case indicated that the "statements need not be made in a judicial setting." However, that case is inapplicable to the current state of law in Idaho.

Idaho recognizes a judicial privilege, as the district court stated, in relying

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12 R. pp. 121-144.

upon *Richeson v. Kessler,* 73 Idaho 548 (1953). The holding indicated that the defamatory material had to be made in a judicial proceeding having some relation to the cause. The case made the necessity of having someone cloaked with judicial power such as an attorney. That is lacking in the case at bar. No attorney is receiving the statements. The district court's reasoning is flawed under the current Idaho case law.

The Restatement of Torts (Second) at §586 applies only to attorneys. The court quoted the Restatement as follows: "based upon the public interest in according to all men the utmost freedom of access to the courts of justice for the settlement of their private disputes." That is exactly what the appellants are attempting to do-- Resort to the courts for the extreme malice, hatred and spite inflicted by the brother and uncle, the respondent, upon the appellants.

The court indicates that the appellants could have filed a criminal action for filing a false police report or perjury. The court indicates that the appellants did not have to file a civil suit. <u>That is not the court's decision</u>. No sworn statement exists for perjury. This statement and inference, by the district court, go beyond a summary judgment action. Resort to the civil courts is not restricted to criminal law that does not exist in Idaho.

<u>Negligent or Intentional Infliction of Emotional Distress/Invasion of Privacy</u>

The court, in one paragraph, indicates that if judicial privilege applies to defamation, then it also applies to claims of intentional or negligent infliction of emotional distress and invasion of privacy.

Once again, the material fact that the appellants were at the respondents'

real property, by permission, defeat the secondary statements of respondent, Ovanes, to the police. The first step is to determine the material factual dispute on whether the appellants were at the real property by permission. If so, then all the statements made thereafter are flawed as stated by the respondent.

The same reasoning applies, as stated above, to malicious prosecution. The elements are slightly different but the affirmative defense is one of judicial privilege. No question exists that material issues of fact exist on all of the claims. The respondent relies upon a legal principle as an affirmative defense. If judicial privilege does not exist, then the cause(s) of action remain viable.

Judicial privilege refers to communications in the court context most generally at trials or hearings. The term privilege in tort law from *Blacks Law Dictionary* defines the same as : " a general term applied to certain rules of law by which particular circumstances justify conduct which otherwise would be tortious, and thereby defeat the tort liability (or defense) which, in the absence of such circumstances, ordinarily even if all of the fact necessary to a prima facie case of tort liability can be proved, there are additional facts present sufficient to establish some privilege and therefore defendant has committed no tort.

Idaho <u>has not</u> held that statements to police officers are under the umbrella of judicial privilege. Idaho has no corresponding section 47(b) as does California and the *Hagberg* case is not persuasive or applicable to the instant case due to the material facts preceding the statements to the police. Idaho has no case similar to *Hagberg* nor does statements to police officers exist that are extraneous and not given under oath cloak a person with judicial privilege. Statements to police are

often flawed with mistruths, misperceptions and even hatred and malice. See also, Malim *v. Engler,* 124 Idaho 733, 864 P.2d 179 (Ct. Appeals 1993).

In sum, case law is lacking, in Idaho, on the judicial privilege exception to law enforcement. It would be urged that statements to police officers should not be included in judicial privilege as the same may not be reliable and are not given under oath.

2. <u>Statute of limitation defenses to breach of contract, quantum merit and implied-in-fact contracts are in error based upon the disputed facts</u>.

The statute of limitations applies from the last major work performed. Galust has stated in his declaration that the last major work occurred in the limitation period. Such a fact question has been contested by both parties and is not ripe for summary judgment.

Appellant, Berian, stated as follows:

"Ovanes agreed to all of these services, agreed to compensation, and a meeting of our minds occurred on this work and thoughts occurred <u>which were commenced within four years of the filing of the complaint herein</u>."

Clearly, the appellants have placed at issue the four (4) year statute of limitations period. The foregoing was under oath and presented to the district court. The court cannot simply ignore such facts nor make inferences that are for the jury to decide upon. Nor can the court make inferences on the credibility of the witnesses. That is a fact-finder determination at trial. This court is only ruling upon summary judgment. The movant must establish the lack of a material disputed fact. (See Standard of Review and cases cited above).

Appellants have stated specifically that the performed labors occurred within the limitations time period. The district court was well aware of this statement. The court then states that respondent indicates that last work was performed in the year 2010. It states Galust began drilling a well. Galust has no well drilling equipment! The respondent does not state that Appellants have well drilling equipment.

Clearly, the two parties disagree on the time period. However, that is a factual matter for the jury. The court is in no position to accept one factual declaration over the other or to examine the credibility of the witness statements. A jury makes that decision. Material factual issues are decided by the fact-finder.

The district court then intertwines the contractor license issue with the limitations of action issue. These two principles are completely different. However, the district court only ruled upon the statute of limitation issue. The district court did not rule upon the contractor license issue. Thus, the contractor license issue is not before this court. The court stated: "Therefore, the Court holds that Count III (sic) [Three] of Galust and Julia's Complaint is barred by the applicable statues of limitations and does not reach the question of whether Galust and Julia violated the Idaho Contractor's Registration Act."

Appellant declaration is relevant to show he was always at respondents' residence by permission as follows:

"My brother, Ovanes, is a family member. I have helped him over the years with his landscaping and outbuildings. <u>Thus, entrance into his property was never denied to me and my daughter.</u> The landscaping involved in this case was not that of a contractor but rather removal of trees, flowers, shrubs and various plants from

my home to the home of my brother. Ovanes agreed, in advance, to this arrangement and agreed to compensate for the time labor and plant materials for this project. He hired Julia and me by wages to be paid. Furthermore, he agreed to me moving outbuildings from my home to his for beautification for art and enjoyment of life. These are not contractor services but rather removal and establishment of buildings and landscaping for a family member. The outbuildings were enhanced by labor. . He Furthermore, Ovanes did not want building permits or any governmental authorities to be aware of these family agreements did not obtain any governmental approval. I am informed by my attorney of the principle of "unclean hands". He should not be allowed to profit by his illegal actions and then accuse me, a family member of not obtaining a contractor license when I did not perform contractor services. Ovanes bought materials, I bought materials and provided buildings and none of these actions, in my belief, were acting as a contractor. We moved the buildings, performed landscaping and added carpentry work to the final product."13

Appellant goes on to state the following:

"I provided farm buildings from my premises to the location in question. These buildings were for the purpose of storage of for painting by Ovanes. I considered the same as farm outbuildings wherein he could store almost anything. The trees and shrubbery, flowers, bushes were materials provided from my location to that of Ovanes. Both, he and I purchased additional materials that were added to the building structures. I have never held myself out as a registered contractor nor have I performed any type of construction or landscaping work for any other individual. I was performing work, along with my daughter, for wages from Ovanes. He refused to pay the wages when the requested tasks were completed. It is my understanding based upon allegations of the defendants that the services performed was for the transfer of the real property to Socorro. The real property in question was greatly enhanced by the efforts by me and my daughter. The values of those enhancements are in excess of $10,000.00 and can be determined by a fact-finder. Ovanes Berberian places no facts in the record to refute the known knowledge that the real property was improved."14

The record before the district court is filled with sworn statements that the appellants were at the respondents' home by permission. This factual matter has to be determined prior to any "probable cause or judicial privilege" issues.

3. The attorney fee decision is not contained in the clerk's record and cannot be argued at this point.

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13 R. 192-200. Par. 31-34.
14 Id. Par. 33.

The respondents requested fees for the summary judgment. Appellants argue that respondents request is premature and that there is not a statutory basis for fees as the instant matter involves a case of first impression in Idaho.

The court issued an attorney fee decision which is not included in the clerk's record. As to Counts One, Two and Four there are no issues. As to the counter-claim there are not issues before this court. County three is the only matter that contains any issues that are not yet before the court.

If this court allows the trier-of-fact to decide upon the entire case on disputed items, the court would not be deciding and ruling upon the credibility of the witnesses. The fact-finder: jury, would be making those factual determinations.

CONCLUSION

1. **The relief requested by the appellants is that this court reverse the summary judgment decision issued by the district court and remand the matter for trial on all matters to allow the jury to make the factual findings and decisions as to the credibility of witnesses.**
2. **Attorney fees are not before this court; and, would need factual determinations and the weight to be given the credibility of witnesses which the district court has made inferences without a factual basis. Thereafter, a statutory/contractual basis must exist to apply the I.R.C.P., Rule 54 factors to award fees and/or costs. Dated this 15th day of October, 2019.**

/s/ Robin D. Dunn
Robin D. Dunn
Attorney for Appellants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of October, 2019, a true and correct copy of the foregoing was delivered, via the E-filing system of I-court as set forth in the Idaho Appellate Rules to the following:

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