

Bond Case Briefs

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Castille v. St. Martin Parish School Board

Supreme Court of Louisiana - March 15, 2017 - So.3d - 2017 WL 1041216 - 2016-1028 (La. 3/15/17)

School bus driver brought action against school board, seeking damages in both contract and tort law for school board's failure to comply with state tenure laws in reassigning him to different route.

Following a bench trial, the Judicial District Court dismissed bus driver's contractual claims. Bus driver appealed. The Court of Appeal affirmed in part and reversed in part. School board applied for writ of certiorari.

The Supreme Court of Louisiana held that:

- School board breached its implied contractual obligations when it failed to take bus driver's seniority into account when it reassigned bus routes, but
- School board's breach of contract was not committed in bad faith.

School board's breach of contract in failing to take tenured school bus driver's seniority into account when it reassigned bus routes was not committed in bad faith, and thus bus driver was not entitled to recover contractual damages for acceleration of his episodes of anxiety and depression. Board's decision to redraw routes was based on legitimate goal of saving money on fuel costs by making routes more efficient, and board's decision to ignore drivers' seniority in assigning routes was at most a product of negligence or bad judgment.