

SAMPLE

Meints v. Huntington, 276 F. 245 (8th Cir. 1921).

FACTS: In the summer of 1918, during the waning years of WWI, Plaintiff Meints – a Minnesota resident of Luverne – was the subject of numerous rumors questioning his patriotism, especially his purported involvement with what appears to be an anti-war newspaper. After a couple of run-ins with local residents – one of which involved transporting Meints across the state line to Iowa, 75-80 men went to home of Meints’s sons – where Meints was residing at the time – on August 19. Meints and his sons saw the nearly 25 cars coming, went in the house and fastened the screen door. One Defendant forced the door open. A number of men followed, assaulting one son on the way in and throwing him out of the house. Meints stood at the head of the stairs, armed with a gun and a fork handle and refusing to leave with the men. After a short discussion among and between Meints, his other son and Defendant Long, Meints left the house and was taken to Defendant Huntington’s car. Additional Defendants entered the car, and the whole caravan set off for Luverne, where they held him for two or three hours, refusing to let him speak to his wife and jeering at him. Defendants then returned him to the car and transported him to the South Dakota state line, where he was removed from the car by other, masked men and assaulted, whipped, tarred and feathered, and warned never to return to Minnesota.

ISSUE(S):

1. Did the trial court err when it instructed the jury, over Plaintiff’s objection, that everything that happened to Meints before reaching the South Dakota state line was not unlawful false imprisonment because Meints had consented?
2. Did the trial court err when it allowed Defendants, over Plaintiff’s objection, to offer evidence of Meints’s alleged disloyal acts in support of their defense that they falsely imprisoned Meints in order to protect him from the violent acts of others?

HOLDING(S):

1. Yes.
2. Yes.

REASONING:

1. Rule: A person does not consent to restraint when he submits only because of words or acts that he fears to disregard. False imprisonment is a wrong that consists of imposing – by force or threats – an unlawful restraint upon

a man's freedom. Any such restraint is unlawful unless there is proof of justification, i.e. a legal imprisonment. The evidence clearly showed that from the time Defendants reached the house, they would not have tolerated any resistance from Meints. Such interference with one's liberty, even if by words alone, is sufficient duress to constitute restraint. One, such as Meints, who does not resist such restraint has not consented to the unlawful acts. Thus, when Meints did as he was told from the outset, he had not consented to being imprisoned, and the trial court erred in instructing the jury to the contrary.

2. Rule: The law does not sanction a defense that the rights of one may be violated in order to prevent others from doing the same. The law does not sanction any defense that a small wrong may be committed in the interest of preventing a greater wrong, at least in this context. The evidence the trial court allowed in over Plaintiff's objection was designed to ameliorate or modify the harshness of Defendants' acts. However, actual malice – personal ill-will or hatred – is not an element of false imprisonment and the evidence was thus irrelevant. Defendants' deliberate intention to restrain Plaintiff in violation of his rights is unaffected by this evidence, and the trial court erred in allowing the jury to hear it.