

***Palsgraf v. Long Island Railroad Co.***

248 N.Y. 339, 162 N.E. 99 (1928)

**Posture:** The Long Island Railroad Company, the Defendant, appealed to the Court of Appeals of New York after the Appellate Division affirmed the trial court's judgment in favor of Helen Palsgraf, the Plaintiff, who had been injured by a weighing scale on one of the Defendant's rail station platforms. The Court of Appeals granted review to determine whether the railroad owed a duty of care to a plaintiff who stood outside the foreseeable zone of danger created by its employees' conduct.

**Facts:** Helen Palsgraf was standing on a platform of the Long Island Railroad after purchasing a ticket to Rockaway Beach. As a departing train began to move, two men ran to catch it; one boarded successfully, while the other, carrying a small newspaper-wrapped package, jumped aboard but struggled to maintain his balance. A railroad guard on the car reached forward to pull the man in while a guard on the platform pushed him from behind. In the process, the man dropped his package onto the rails. The package contained fireworks and exploded upon impact with the train's wheels. The explosion's shockwave toppled a set of coin-operated weighing scales at the far end of the platform, striking and injuring Palsgraf.

**Issue:** Does the defendant's duty of care extend to a plaintiff injured by an unforeseeable chain of events triggered by its employees' negligence toward a third party?

**Held:** No

**Reasoning and Rationale:** The Court of Appeals reversed the Appellate Division and dismissed the complaint, holding that the railroad's guards owed no duty of care to Palsgraf. Writing for the majority, Chief Judge Cardozo established that negligence is inherently relational and must be defined in terms of the risk reasonably foreseeable to a plaintiff or plaintiffs. The guards' conduct, while potentially negligent toward the man holding the package, was not negligent toward Palsgraf, who stood a distance away at the opposite end of the platform. Nothing in the outward appearance of the small, newspaper-wrapped parcel could have alerted the guards to any risk of harm to distant bystanders; as such, no duty ran to her. The Court explained that a defendant's duty of care extends only as far as the risk it could reasonably foresee, and because there was no reason to anticipate danger to Palsgraf from the guard's actions, the railroad owed her no legal obligation for protection. The Court further rejected the notion that Palsgraf could recover simply because the guards were negligent toward someone else, holding that she was required to prove the defendant's conduct was wrongfully directed at her specifically, rather than her harm being a consequence of a wrong done to another party.

**Concurring Opinions and Dissenting Opinions:** Justice Andrews dissented, joined by Justices Crane and O'Brien, arguing that the majority's understanding of negligence was too narrow. In Andrew's view, every person owes a duty at large to refrain from acts that unreasonably threaten others' safety. When such negligent acts occur, the actor should be liable for all their proximate consequences, whether foreseeable or not. Andrews contended that liability should be limited by proximate cause, asking whether a natural and continuous sequence connected the negligent act to the resulting harm. Because the guards' negligence directly set in motion the explosion and injury to others nearby, he deemed the act to be proximately predictable.