

**Limited Jurisdiction and Traffic Law Committee  
Judicial Conference of Indiana**

**Minutes  
February 12, 2026  
via Microsoft Teams**

1. Attendance: The following members participated in the meeting: James Burn, Garland Graves, Steven Hagen, David Happe (Chair), Joseph Johns, Katie Kurowski, Steven Poore, Jennifer Wilson Reagan, and Jonathan Sturgill. The meeting was staffed by Kelly Elliott from IOCS.
2. Approval of Minutes: The committee reviewed and unanimously approved the minutes from the November 13, 2025, meeting.
3. Revisions to Benchbook/Forms/Manuals:
  - a. 2025 enacted legislation: Judge Graves drafted revisions for the Benchbook and Small Claims Manual to incorporate recently enacted legislation. The committee reviewed and unanimously approved the draft revisions. Kelly will update the relevant documents accordingly.
  - b. Certified abstract of record of judgment to BMV: At the meeting in November, the committee discussed I.C. 9-25-6-9 and the requirement placed on the court to submit a certified abstract of record of judgment to the Indiana Bureau of Motor Vehicles. Judge Sturgill reviewed the matter further and drafted revisions for the Benchbook to incorporate I.C. 9-25-6-9. The committee reviewed the proposed revisions. Judge Johns volunteered to review the revisions further and provide recommendations to the committee at the next meeting.
4. 2026 Proposed Legislation: The committee reviewed relevant proposed legislation.
5. Other Business:
  - a. Update on rule amendment: Kelly submitted the rule amendment proposal to the Rules Committee and will update the committee on any correspondence received from the Rules Committee.
  - b. Indiana Supreme Court Order: The Indiana Supreme Court's Order on Final Recommendations made by the Commission on Indiana's Legal Future directs the committee "to determine what court rules may require amendment to better effectuate the purpose of small claims proceedings if the statutory small claims limits are raised." Judge Happe confirmed that a subcommittee was established to develop recommendations for this purpose for the committee to review.
6. Case Review: The committee discussed Parker v. Ind. State Prison, 266 N.E.3d 775 (Ind. Ct. App. 2025) and elected to include it in the Benchbook. The committee also discussed Williams v. Kirch, 268 N.E.3d 284 (Ind. Ct. App. 2025) and Davidson v. Hammond, 269 N.E.3d 1219 (Ind. Ct. App. 2025). Judge Johns volunteered to review the Indiana Small Claims Rules to determine if changes

should be made to the Benchbook or Small Claims Manual as it relates to guidance on jury trial requests.

The committee had a general discussion regarding Jones v. Full Spectrum Prop. Mgmt., 25A-EV-532 (Ind. Ct. App. Feb. 10, 2025). The committee will continue to discuss Jones at the next meeting.

**2026 Meeting Dates: May 14, August 13, and November 12**