

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Ramona Ramos, et al. v. Mennonite General Hospital, Inc., et al.

Ramos · No. Civil No. 23-1345 (RAM) · Decided May 29, 2026

SUMMARY

The United States District Court for the District of Puerto Rico denied post-trial motions seeking judgment as a matter of law, amendment or alteration of judgment, remittitur, or a new trial following a medical-malpractice jury verdict. The court held that sufficient evidence supported the jury’s finding that Dr. Yaritza Suárez-Rodríguez’s negligence contributed to the decedent’s death, and that South-Central Emergency Group waived and failed to substantiate its independent-contractor defense. The court also concluded that the evidence supported the jury’s \$200,000 emotional-distress awards to each plaintiff.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	Raúl M. Arias-Marxuach
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	May 29, 2026
DOCKET	Civil No. 23-1345 (RAM)
DISPOSITION	denied
PROCEDURAL POSTURE	After a jury verdict for plaintiffs in a Puerto Rico medical-malpractice wrongful-death action, Dr. Suárez and SIMED moved for judgment as a matter of law or a new trial, and South-Central moved for judgment as a matter of law or to alter or amend the judgment, for remittitur, or for a new trial.
STANDARD OF REVIEW	Under Rule 50, judgment contrary to a jury verdict is proper only when the evidence points so strongly and overwhelmingly in favor of the moving party that no reasonable jury could have returned an adverse verdict; the court may not assess witness credibility, resolve testimonial conflicts, or weigh the evidence. Rule 59 permits a broader review than Rule 50, but when a new-trial motion rests on evidentiary sufficiency, the Rule 50 and Rule 59 standards effectively merge. Damages are reviewed in the light most favorable to the prevailing party, and remittitur requires a showing that the award is grossly excessive, inordinate, conscience-shocking, or a denial of justice.

PRECEDENTIAL VALUE	Unknown; district court opinion with no reported citation identified.
PARTIES	Dr. Yaritza G. Suárez-Rodríguez, Sindicato de Aseguradores para la Suscripción Conjunta del Seguro de Responsabilidad Profesional Médicohospitalaria (SIMED), South Central Emergency Group, LLC v. Ramona Ramos, Roberto Jiménez, Letsi Jiménez, Alex Jiménez Jr., Onialex Jiménez

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QUESTIONS PRESENTED

1. Whether the trial evidence provided a legally sufficient basis for the jury to find that Dr. Suárez's negligence was an adequate or proximate cause of Jiménez-Ramos's death.
2. Whether Dr. Suárez and SIMED were entitled to a new trial under Rule 59 based on the sufficiency of the causation evidence.
3. Whether South-Central was entitled to judgment as a matter of law or a new trial because the independent-contractor defense was waived by omission from the final pretrial order and was not tried by consent.
4. Whether the evidence supported the jury's \$200,000 emotional-distress award to each plaintiff and whether remittitur or a new trial on damages was warranted.

HOLDINGS

1. The evidence was legally sufficient for a reasonable jury to find that Dr. Suárez's negligent acts or omissions were an adequate cause of Jiménez-Ramos's death; Puerto Rico law did not require her negligence to be the sole or final cause.
2. South-Central was not entitled to judgment as a matter of law, amendment of the judgment, or a new trial on the independent-contractor issue because it waived the Article 1540 theory by failing to include it in the final pretrial order, the issue was not tried by consent, and the evidence did not support submitting it to the jury.
3. The evidence supported the jury's identical \$200,000 emotional-distress awards to each plaintiff, and South-Central failed to show that the awards were grossly excessive, inordinate, conscience-shocking, or a denial of justice.

KEY QUOTATIONS

“The law does not require a showing that Dr. Suárez’s actions or omissions were the sole or final cause of Mr.

Jiménez’s death.” (Section III.A)

“Since South-Central did not include its theory of independent contractor liability pursuant to Article 1540 of the Puerto Rico Civil Code, it effectively waived it.” (Section III.B)

“The Court finds no such dissonant chord in this case.” (Section III.C)

FACTUAL BACKGROUND

Alex Jiménez-Ramos was treated in Mennonite General Hospital's emergency room while under the care of Dr. Yaritza Suárez-Rodríguez and later Dr. Alejandro Marmolejo-Morales. Trial evidence indicated that Dr. Suárez failed to adequately stabilize him, transfer him to intensive care, establish a permanent airway and mechanical ventilation, order serial oxygen-saturation monitoring, and consult a surgeon after a radiologist's recommendation. Jiménez-Ramos deteriorated, suffered cardiac arrest, and died; the jury found the defendants' medical negligence adequately caused his death and awarded emotional-distress damages to his relatives.

PROCEDURAL HISTORY

A jury trial began on October 27, 2025, and on December 5, 2025, the jury found that Dr. Suárez, Dr. Alejandro Marmolejo-Morales, and Mennonite General Hospital deviated from the applicable standards of care and that their deviations adequately caused Alex Jiménez-Ramos's death and plaintiffs' damages. The jury awarded each of five plaintiffs \$200,000 and apportioned liability among Dr. Suárez, Dr. Marmolejo, and the hospital's nursing staff. The court entered judgment imposing joint and several liability, and denied the post-trial motions addressed in this opinion.

DISPOSITION

denied

CASES CITED

- Rivera Castillo v. Autokirey, Inc., 379 F.3d 4, 9 (1st Cir. 2004)
- Annoni Mesias v. Hosp. HIMA San Pablo, 2021 WL 1125019, at *1 (D.P.R. 2021)
- Rodriguez-Valentin v. Municipality of Guaynabo, 2022 WL 556194, at *5, *21 (D.P.R. 2022)
- Jennings v. Jones, 587 F.3d 430, 436 (1st Cir. 2009)
- Lama v. Borrás, 16 F.3d 473, 475, 477-78 (1st Cir. 1994)
- Diaz-Alarcon v. Flandez-Marcel, 944 F.3d 303, 305 n.2 (1st Cir. 2019)
- Correa-Carrillo v. Grupo HIMA San Pablo-Fajardo Inc., 594 F. Supp. 3d 414 (D.P.R. 2022), aff'd sub nom. Carrillo v. Grupo Hima San Pablo (Fajardo), Inc., 2026 WL 528601 (1st Cir. 2026)
- Muniz v. Rovira, 373 F.3d 1, 5 (1st Cir. 2004)
- Machado-Mariscal v. Bayamon Med. Ctr. Corp., 2024 WL 5405379 (D.P.R. 2024)
- Whittenburg v. Col. Ntra. Sra. Del Carmen, 182 D.P.R. 937, 952 (2011)
- Cruz v. Municipality of Lajas, 2022 WL 2077915, at *1 (D.P.R. 2022)
- S.L.G. Hernández-Beltrán v. TOLIC, 151 D.P.R. 754, 766, 768 (2000)

- Rodríguez-García v. Miranda-Marín, 610 F.3d 756, 774 (1st Cir. 2010)
- Correa v. Hosp. S.F., 69 F.3d 1184, 1195, 1198 (1st Cir. 1995)
- Action Mfg., Inc. v. Fairhaven Textile Corp., 790 F.2d 164, 167 (1st Cir.)
- DCPB, Inc. v. City of Lebanon, 957 F.2d 913, 917 (1st Cir. 1992)
- Galindo v. Stooddy Co., 793 F.2d 1502, 1513 (9th Cir. 1986)
- Rodriguez v. Doral, 57 F.3d 1168, 1172-73 (1st Cir. 1995)
- United States v. Rodriguez, 115 F.4th 24 (1st Cir. 2004)
- Wortley v. Camplin, 333 F.3d 284, 297 (1st Cir. 2003)
- Gutierrez-Rodriguez v. Cartagena, 882 F.2d 553, 579 (1st Cir. 1989)
- Trainor v. HEI Hosp., LLC, 699 F.3d 19, 33 (1st Cir. 2012)
- Santana-Concepcion v. Centro Médico del Turabo, Inc., 768 F.3d 5, 10 (1st Cir. 2014)
- Santini Rivera v. Serv. Air, Inc., 137 P.R. Dec. 1, 10-12 (1994)
- Rivera Concepcion v. Pepsi Cola of Puerto Rico, 288 F. Supp. 2d 167, 173 (D.P.R. 2003)
- Santana Otero v. United States, 2009 WL 10721032 (D.P.R. 2009)
- Castillo-Quinones v. Hosp. de la Concepcion, Inc., 2021 WL 2451191, at *2 (D.P.R. 2021)
- Lopez Nieves v. Marrero Vergel, 939 F. Supp. 124, 126 (D.P.R. 1996)
- Serrano v. Nicholson Nursery, Inc., 844 F. Supp. 73, 76 (D.P.R. 1994)
- Milone v. Mocerri Family, Inc., 847 F.2d 35, 37 (1st Cir. 1988)
- Dumanian v. FirstBank of Puerto Rico, 2024 WL 197429, at *3 n.4 (D.P.R. Jan. 17, 2024)

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