

SUPREME COURT OF TENNESSEE

Doyle v. Frost

49 S.W.3d 853 (Tenn. 2001) · Decided July 9, 2001

SUMMARY

The Tennessee Supreme Court held that Tenn. R. Civ. P. 15.03 permits an amended complaint adding a governmental entity as a defendant to relate back to the date of the original, timely filed complaint. The court concluded that applying the relation-back doctrine does not extend the Tennessee Governmental Tort Liability Act's statute of limitations when the governmental entity received timely notice and the rule's other requirements are satisfied.

CASE DETAILS

COURT	Supreme Court of Tennessee
WRITING FOR THE COURT	Adolpho A. Birch, J.; E. Riley Anderson, C.J.; Frank F. Drowota, J.; Janice M. Holder, J.; William M. Barker, J.
JURISDICTION	Tennessee
DECIDED	July 9, 2001
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiffs sought interlocutory appellate review of the trial court's denial of their motion under Tennessee Rule of Civil Procedure 15.03 to amend their medical-negligence complaint to add the Jackson Madison County General Hospital District, a governmental entity, as a defendant. The Court of Appeals affirmed, and the Tennessee Supreme Court granted review.
STANDARD OF REVIEW	The denial of a motion to amend ordinarily is reviewed for abuse of discretion. Because the issue concerned interpretation of the scope of Tennessee Rule of Civil Procedure 15.03, the Supreme Court applied de novo review with no presumption of correctness for the trial court's legal determinations.
PRECEDENTIAL VALUE	published precedential opinion of the Supreme Court of Tennessee
PARTIES	Edgar Forrest Doyle, Brenda Doyle v. Jimmy Pratt, M.D., Bolivar General Hospital, Inc., West Tennessee Health Care, Inc.

TOPICS

motion to amend

civil procedure

statute of limitations

statutory interpretation

medical malpractice

PRACTICE AREAS

civil procedure

medical malpractice

governmental liability

sovereign immunity

QUESTIONS PRESENTED

1. Whether Tennessee Rule of Civil Procedure 15.03 permits an amendment adding a governmental entity as a defendant to relate back to the date of the original complaint.
2. Whether the Tennessee Governmental Tort Liability Act's one-year statute of limitations and sovereign-immunity provisions preclude application of Rule 15.03 to a governmental entity that received timely notice of the action.

HOLDINGS

1. Tennessee Rule of Civil Procedure 15.03 applies to governmental entities. An amendment adding a governmental entity relates back to the date of the original complaint when the Rule's requirements are satisfied.
2. The doctrine of sovereign immunity does not preclude application of Rule 15.03 when the party sought to be added by amendment is a governmental entity.

KEY QUOTATIONS

“In sum, we hold that the relation back doctrine embodied in Rule 15.03 does not extend or enlarge the applicable statute of limitations period, for amendments pursuant to the rule are considered filed on the date of the original, timely pleading, and such amendments only may be made if the Rule's notice requirements are met.” (49 S.W.3d at 860)

“Thus, no reason exists to preclude application of Rule 15.03 to governmental entities.” (49 S.W.3d at 860)

FACTUAL BACKGROUND

Edgar Doyle suffered a back injury and was treated at Bolivar General Hospital by Dr. Jimmy Pratt, who diagnosed urinary incontinence and did not identify the ruptured disk later diagnosed at another hospital. The Doyles filed a negligence action within the applicable limitations period against Bolivar, Pratt, and West Tennessee Health Care, among others. After learning that Pratt may have been employed by the Jackson Madison County General Hospital District, they sought to add the Hospital District as a defendant; the Hospital District had received service of the original complaint through its agent within the limitations period and within 120 days after commencement.

PROCEDURAL HISTORY

The Doyles filed a negligence complaint against several defendants, including Bolivar General Hospital, Dr. Jimmy Pratt, and West Tennessee Health Care, Inc. After the defendants disputed Pratt's employment relationship, the Doyles moved to amend the complaint to add the Jackson Madison County General Hospital

District. The trial court denied the motion as untimely under the Tennessee Governmental Tort Liability Act, and the Court of Appeals affirmed. The Tennessee Supreme Court reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the denial of the Doyles' motion to amend their complaint and remand for further proceedings consistent with the opinion.

CASES CITED

- Henderson v. Bush Bros. & Co., 868 S.W.2d 236, 237-38 (Tenn. 1993)
- Lipscomb v. Doe, 32 S.W.3d 840, 843-44 (Tenn. 2000)
- Karash v. Pigott, 530 S.W.2d 775, 777 (Tenn. 1975)
- Bloomfield Mechanical Contracting, Inc. v. Occupational Safety & Health Review Comm'n, 519 F.2d 1257, 1262 (3d Cir. 1975)
- Schiavone v. Fortune, 477 U.S. 21, 38, 106 S. Ct. 2379, 2389, 91 L. Ed. 2d 18 (1986) (Stevens, J., dissenting)
- Hawks v. City of Westmoreland, 960 S.W.2d 10, 14 (Tenn. 1997)
- Lucius v. City of Memphis, 925 S.W.2d 522, 525 (Tenn. 1996)
- Ezell v. Cockrell, 902 S.W.2d 394, 399 (Tenn. 1995)
- Floyd v. Rentrop, 675 S.W.2d 165, 168 (Tenn. 1984)
- Gamble v. Hospital Corp. of America, 676 S.W.2d 340, 343 (Tenn. Ct. App. 1984)
- Tiller v. Atlantic Coast Line R. Co., 323 U.S. 574, 65 S. Ct. 421, 89 L. Ed. 465 (1945)
- Nance v. City of Knoxville, 883 S.W.2d 629 (Tenn. Ct. App. 1994)
- Rael v. Montgomery County, 769 S.W.2d 211 (Tenn. Ct. App. 1988)
- Williams v. Memphis Light, Gas, and Water Div., 773 S.W.2d 522 (Tenn. Ct. App. 1988)
- Daniel v. Hardin County Gen. Hosp., 971 S.W.2d 21, 25 (Tenn. Ct. App. 1997)
- Eye Clinic, P.C. v. Jackson-Madison County Gen. Hosp., 986 S.W.2d 565, 568-69 (Tenn. Ct. App. 1998)
- Finister v. Humboldt Gen. Hosp., 970 S.W.2d 435, 438-40 (Tenn. 1998)