

COURT OF APPEALS OF INDIANA

In re Commitment of A.V., A.V. v. Richard L. Roudebush Veterans
Affairs Medical Center

25A-MH-1516 · No. 25A-MH-1516 · Decided November 21, 2025

SUMMARY

The Indiana Court of Appeals affirmed a temporary commitment order for A.V., holding that the trial court did not abuse its discretion by conducting the commitment hearing remotely over A.V.’s objection. The court found that specific safety concerns established good cause under Interim Administrative Rule 14(C) and concluded that any error would have been harmless because A.V. participated meaningfully in the hearing.

CASE DETAILS

COURT	Court of Appeals of Indiana
WRITING FOR THE COURT	Judge Felix; Judge Brown; Judge Scheele
JURISDICTION	Court of Appeals of Indiana
DECIDED	November 21, 2025
DOCKET	25A-MH-1516
DISPOSITION	affirmed
PROCEDURAL POSTURE	A.V. appealed an order of temporary involuntary commitment entered after the Marion Superior Court conducted the commitment hearing remotely over his objection.
STANDARD OF REVIEW	The trial court's finding of good cause under Interim Administrative Rule 14(C) is reviewed for an abuse of discretion. Any error in conducting the hearing remotely is reviewed for harmlessness based on whether it affected A.V.'s substantial rights.
PRECEDENTIAL VALUE	published and precedential
PARTIES	A.V. v. Richard L. Roudebush Veterans Affairs Medical Center

TOPICS

- health law
- appellate procedure
- standard of review
- harmless error
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion under Interim Administrative Rule 14(C) by conducting A.V.'s temporary commitment hearing remotely over his objection.
2. Whether any error in conducting the commitment hearing remotely was harmless because it did not affect A.V.'s substantial rights.

HOLDINGS

1. The trial court did not abuse its discretion in finding good cause to conduct the temporary commitment hearing remotely. The specific, testimony-supported safety risks associated with an in-person hearing satisfied the good-cause requirement.
2. Even if the trial court erred in conducting the commitment hearing remotely, the error was harmless because A.V. participated, testified, conferred with counsel, received effective advocacy, and was not denied a meaningful opportunity to be heard or otherwise prejudiced in his substantial rights.

KEY QUOTATIONS

“A court must conduct all testimonial proceedings in person except that a court may conduct the proceedings remotely for all or some of the case participants for good cause shown or by agreement of the parties.” (at 6)

“To show good cause under Interim Administrative Rule 14(C), the trial court “must offer something more than a one-size-fits-all, boilerplate pronouncement; good cause requires something specific to the moment, the case, the court, the parties, the subject matter, or other relevant considerations.”” (at 6)

FACTUAL BACKGROUND

A.V., who had schizophrenia, was hospitalized after a car accident and a physical altercation with law enforcement. The Hospital alleged that he was dangerous based on threatening and disorganized behavior, and sought a temporary commitment. Treating psychiatrists testified that an in-person hearing posed safety risks because A.V. had threatened staff, had previously been physically combative and restrained, might become agitated or attempt to elope, and could be harmed by the use of restraints.

PROCEDURAL HISTORY

The Hospital petitioned for A.V.'s involuntary temporary commitment. The trial court initially set a remote hearing, later considered A.V.'s objection and the Hospital's request for an in-person hearing, found good cause to continue remotely, and entered a temporary commitment order after finding A.V. gravely disabled. A.V. appealed, challenging only the remote format of the commitment hearing.

DISPOSITION

affirmed

CASES CITED

- B.N. v. Health and Hospital Corp., 199 N.E.3d 360, 363-65 (Ind. 2022)
- Campbell v. State, 161 N.E.3d 371, 375-76 (Ind. Ct. App. 2020)
- J.P. v. G.M., 14 N.E.3d 786, 789-90 (Ind. Ct. App. 2014)
- G.W. v. Madison State Hospital, 245 N.E.3d 153, 159 (Ind. Ct. App. 2024)
- Miller v. Patel, 212 N.E.3d 639, 657 (Ind. 2023)
- Dridi v. Cole Kline LLC, 172 N.E.3d 361, 364 (Ind. Ct. App. 2021)
- A.S. v. Indiana University Health Bloomington Hospital, 148 N.E.3d 1135, 1140 (Ind. Ct. App. 2020)

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