

SUPREME COURT OF IOWA

Jenna Sondag v. Orthopaedic Specialists, P.C. and John Hoffman, M.D.

Sondag v. Orthopaedic Specialists, P.C. · No. No. 23-2113 · Decided March 20, 2026

SUMMARY

The Iowa Supreme Court held that a district court may correct an erroneous ruling before final judgment but abused its discretion by revisiting a prior order extending the deadline for designating a medical-malpractice expert nearly four years later and excluding the expert shortly before trial. The court vacated the court of appeals decision, reversed the district court judgment dismissing the action, and remanded the case for trial.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Christensen, Chief Justice; Christensen, C.J.; McDonald, J.; all participating justices
JURISDICTION	Iowa Supreme Court
DECIDED	March 20, 2026
DOCKET	No. 23-2113
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Further review of a decision affirming the Iowa District Court's dismissal of a medical malpractice action for failure to timely designate an expert witness.
STANDARD OF REVIEW	Abuse of discretion for the district court's good-cause determination and its decision to exclude the expert; the Supreme Court reviewed the legal authority to correct a prior ruling de novo or as a legal question.
PRECEDENTIAL VALUE	published
PARTIES	Jenna Sondag v. Orthopaedic Specialists, P.C., John Hoffman, M.D.

TOPICS

- medical malpractice
- professional negligence
- civil procedure
- appellate procedure
- statutory interpretation

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court had authority to correct or reconsider an allegedly erroneous interlocutory ruling before final judgment.
2. Whether the district court abused its discretion in finding good cause under Iowa Code section 668.11(2) to extend Sondag's expert-designation deadline.
3. Whether the district court abused its discretion by revisiting the prior extension four years later, excluding Sondag's expert, and dismissing the medical malpractice action shortly before trial.

HOLDINGS

1. A district court generally has authority to correct an erroneous prior ruling at any time before final judgment, and the manner in which the alleged error is brought to the court's attention is immaterial.
2. The district court did not abuse its discretion in finding good cause under Iowa Code section 668.11(2) for Sondag's failure to timely designate an expert and in extending the deadline.
3. The district court abused its discretion by treating the original expert-designation deadline as controlling years after it had been extended, excluding the expert, and dismissing the action four days before trial.

KEY QUOTATIONS

“Upon further review, we hold that (1) the district court had authority to correct an erroneous ruling any time prior to final judgment, (2) the district court’s 2019 order was not an abuse of discretion, and (3) the district court’s 2023 ruling was an abuse of discretion.” (4)

“In 2019, when the district court extended the expert designation deadline upon a finding of good cause, the original deadline ceased to exist.” (9)

“Treating the earlier deadline as controlling years later—and excluding the expert on that basis—was an abuse of discretion.” (9)

FACTUAL BACKGROUND

Dr. John Hoffman performed Jenna Sondag's hip surgery on February 13, 2017. Sondag filed suit on January 7, 2019, but her counsel failed to calendar the statutory expert-designation deadline because of docketing-software errors, a lengthy trial in another case, and the hospitalization of one of the attorneys. The district court initially found good cause, extended the deadline, and denied summary judgment; after the parties complied with the revised schedule and prepared for trial, the court revisited its ruling four days before trial, excluded Sondag's expert, and dismissed the case.

PROCEDURAL HISTORY

Sondag filed a medical malpractice action and stipulated to an expert-designation deadline under Iowa Code section 668.11. After the deadline passed, the district court found good cause for an extension and denied defendants' summary judgment motion. Nearly four years later, shortly before trial, the district court

reconsidered that ruling, excluded Sondag's expert, and dismissed the action. The Iowa Court of Appeals affirmed, and the Iowa Supreme Court granted further review.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand the case to the district court for trial; the district court must not exclude Sondag's expert on the basis of the superseded original deadline.

CASES CITED

- Godfrey v. State, 847 N.W.2d 578 (Iowa 2014)
- Godfrey v. State, 962 N.W.2d 84 (Iowa 2021)
- Kendall/Hunt Publ'g Co. v. Rowe, 424 N.W.2d 235, 240 (Iowa 1988)
- Donovan v. State, 445 N.W.2d 763, 766 (Iowa 1989)
- Dealers Warehouse Co. v. Wahl & Assocs., 216 N.W.2d 391, 394-95 (Iowa 1974)
- Wilson v. Shenandoah Med. Ctr., 21 N.W.3d 398, 404-06 (Iowa 2025)
- Stanton v. Knoxville Community Hospital, Inc., No. 19-1277, 2020 WL 4498884, at *2 (Iowa Ct. App. Aug. 5, 2020)
- Hantsbarger v. Coffin, 501 N.W.2d 501, 504-06 (Iowa 1993) (en banc)
- Reyes v. Smith, No. 21-0303, 2022 WL 1656238, at *1 (Iowa Ct. App. May 25, 2022)
- Hill v. McCartney, 590 N.W.2d 52, 54-55 (Iowa Ct. App. 1998)
- Nedved v. Welch, 585 N.W.2d 238, 241 (Iowa 1998) (per curiam)
- Kirlin v. Monaster, 19 N.W.3d 108, 117-18 (Iowa 2025)
- Venard v. Winter, 524 N.W.2d 163, 167-68 (Iowa 1994)
- Cnty. Bank v. Shalla, 20 N.W.3d 812, 818 (Iowa 2025)
- State v. Damme, 944 N.W.2d 98, 100, 104-05 (Iowa 2020)
- In re Adoption of S.J.D., 641 N.W.2d 794, 800 (Iowa 2002)
- Meier v. Senecaut, 641 N.W.2d 532, 543 (Iowa 2002)
- Mercer v. Andersen, 715 N.W.2d 114, 123 (Minn. Ct. App. 2006)
- Hanick v. Ferrara, 161 N.E.3d 1, 12 (Ohio Ct. App. 2020)
- Freight Tec Mgmt. Grp. Inc. v. Chemex Inc., 499 P.3d 894, 903-04 (Utah Ct. App. 2021)
- Utah Republican Party v. Herbert, 678 F. App'x 697, 700 (10th Cir. 2017)
- Santos v. D. Laikos, Inc., 139 A.3d 394, 399 (R.I. 2016)
- Boranian v. Richer, 983 A.2d 834, 840 (R.I. 2009)
- Rodriguez v. State, 435 P.3d 399, 411 (Wyo. 2019)

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