

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Tavantzis v. American Airlines, Inc.

Tavantzis · No. 23-cv-05607-NW · Decided September 15, 2025

SUMMARY

The United States District Court for the Northern District of California denied American Airlines’ Rule 50(a) motion for judgment as a matter of law in a jury trial involving alleged violations of airline policies and Article 17 of the Montreal Convention. The court held that conflicting testimony regarding a flight attendant’s response to a passenger’s stroke symptoms could allow a reasonable jury to find for the plaintiffs.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Noél Wise
JURISDICTION	United States District Court for the Northern District of California
DECIDED	September 15, 2025
DOCKET	23-cv-05607-NW
DISPOSITION	other
PROCEDURAL POSTURE	During a jury trial, after Plaintiffs rested, Defendant moved for judgment as a matter of law under Federal Rule of Civil Procedure 50(a).
STANDARD OF REVIEW	Judgment as a matter of law is appropriate before submission to the jury only if no reasonable jury could find for the nonmoving party. The court must draw reasonable inferences in favor of the nonmoving party and may not make credibility determinations or weigh the evidence.
PRECEDENTIAL VALUE	Nonprecedential district court order
PARTIES	American Airlines, Inc. v. Ana Maria Marcela Tavantzis, Plasencia

TOPICS

- civil procedure
- admiralty

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether American Airlines was entitled to judgment as a matter of law under Federal Rule of Civil Procedure 50(a) because Plaintiffs presented no legally sufficient evidence that the airline violated its policies and procedures during Flight 68.
2. Whether the conflicting trial testimony concerning the flight attendant's response to stroke symptoms created an evidentiary basis for a reasonable jury to find for Plaintiffs.

HOLDINGS

1. Judgment as a matter of law was improper because conflicting testimony could permit a reasonable jury to find that American Airlines violated its policies and procedures during Flight 68.

KEY QUOTATIONS

“When the jury is the trier of fact, judgment as a matter of law is appropriate only if no reasonable jury could find in favor of the non-moving party.” (at 2)

“Credibility determinations, the weighing of the evidence, and the drawing of legitimate inferences from the facts are jury functions, not those of a judge.” (at 2)

“The Court will not take the decision out of the jury's hands on those grounds.” (at 3)

FACTUAL BACKGROUND

The case arose from Flight 68 and Plaintiffs' allegations concerning American Airlines' response to stroke symptoms during the flight. The airline's in-flight manual included stroke symptoms that flight attendants were expected to know. Conflicting testimony was presented regarding whether Flight Attendant Eccles failed to act properly on that knowledge at the beginning of the flight or approximately an hour and a half later.

PROCEDURAL HISTORY

The court was presiding over a jury trial that began on September 8, 2025. After Plaintiffs Tavantzis and Plasencia rested on September 10, 2025, American Airlines moved for judgment as a matter of law, arguing that Plaintiffs had not shown that the airline violated its in-flight manual or that any conduct constituted an accident under Article 17 of the Montreal Convention. The court denied the motion because conflicting testimony could permit a reasonable jury to find that American Airlines violated its policies and procedures.

DISPOSITION

other

CASES CITED

- Smith v. Cty. of Riverside, 2019 WL 2902504, at *4 (C.D. Cal. May 28, 2019)

- Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 150-51 (2000)

OPINION

Tavantzis v. American Airlines, Inc.

PER CURIAM.

1 2 3

4 UNITED STATES DISTRICT COURT

5 NORTHERN DISTRICT OF CALIFORNIA

6 7 ANA MARIA MARCELA TAVANTZIS, et Case No. 23-cv-05607-NW al., 8 Plaintiffs,
ORDER DENYING DEFENDANT'S

9 MOTION FOR JUDGMENT AS A

v. MATTER OF LAW

10

AMERICAN AIRLINES, INC., Re: ECF No. 180

11 Defendant. 12

13 Since September 8, 2025, the Court has been presiding over the jury trial of the above 14
referenced action. On September 10, 2025, Plaintiffs Tavantzis and Plasencia (“Plaintiffs”) rested,
15 and American Airlines filed this motion for judgment as a matter of law. Mot. for J. as a Matter
of 16 Law (“JMOL”), ECF No. 180. The allegations and legal questions at issue in this matter are
well 17 known to the court and the parties, so the court does not recite them now. 18 Before a case
is submitted to the jury, a party may move for judgment as a matter of law if 19 the parties that
there is no legally sufficient evidence to support the opposing party’s claim or 20 defense. Fed. R.
Civ. P. 50(a). “When the jury is the trier of fact, judgment as a matter of law is 21 appropriate only
if no reasonable jury could find in favor of the non-moving party.” Smith v. Cty. 22 of Riverside,
2019 WL 2902504, at *4 (C.D. Cal. May 28, 2019). “[T]he court must draw all 23 reasonable
inferences in favor of the nonmoving party, and it may not make credibility 24 determinations or
weigh the evidence.” Reeves v. Sanderson Plumbing Prod., Inc., 530 U.S. 133, 25 150 (2000)
(citation omitted). “Credibility determinations, the weighing of the evidence, and the 26 drawing
of legitimate inferences from the facts are jury functions, not those of a judge.” Id. 27 (quotation
and citation omitted). “[T]he court should give credence to the evidence favoring the]
unimpeached, at least to the extent that that evidence comes from disinterested witnesses.” 2 ||
Reeves, 530 U.S. at 151 (quotation and citation omitted). 3 American Airlines’ motion contends
that Plaintiffs failed to demonstrate that American 4 || Airlines acted in violation of its manual
during the course of Flight 68. According to American 5 || Airlines, “a failure to provide adequate
medical assistance to a passenger, without more, such as a 6 || substantial deviation from the
airline’s policies and procedures or industry standard, is not an 7 ‘accident’ under Article 17 of the
Montreal Convention.” JMOL at 16. Even assuming American 8 || Airlines is right—and the dearth
of law on the Montreal Convention makes that impossible to 9 || confirm—the Court is not

convinced that Plaintiffs failed to provide evidence that American Airlines acted outside the scope of its policies and procedures. As has been discussed frequently during the trial, American Airlines' in-flight manual included various stroke symptoms that flight attendants were expected to know. Conflicting testimony was presented to the jury regarding whether Flight Attendant Eccles failed to properly act on that knowledge, either at the beginning of the flight or an hour and a half in. That testimony could lead a reasonable jury to find that American Airlines violated its policies and procedures. The Court will not take the decision out of the jury's hands on those grounds. Defendants' Rule 50(a) motion is DENIED. IT IS SO ORDERED. Dated: September 15, 2025 Noël Wise 2] United States District Judge

10 || Airlines acted outside the
11 during the trial,
12 || attendants
13 || whether
14 || of the
15 ||
16 || the jury's hands on those grounds.
17 Defendants' Rule 50(a) motion is DENIED.
18 IT IS
19 || Dated: September 15, 2025 Noël Wise 2]
20 United States District Judge
21
22
23
24
25
26
27
28