

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PRECEDENTIAL VALUE	Nonprecedential district court order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)

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