

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Fernando Corona v. Matthew Hunter

Corona v. Hunter · No. CV-23-01251-PHX-JAT · Decided February 19, 2026

SUMMARY

The United States District Court for the District of Arizona denied Defendant Matthew Hunter’s oral motions for judgment as a matter of law under Federal Rule of Civil Procedure 50(a) in Fernando Corona’s action alleging battery, negligence, and excessive force under 42 U.S.C. § 1983. The court held that sufficient evidence supported causation, intent, and the alleged use of unreasonable force, and that credibility determinations were reserved for the jury.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	James A. Teilborg
JURISDICTION	United States District Court for the District of Arizona
DECIDED	February 19, 2026
DOCKET	CV-23-01251-PHX-JAT
DISPOSITION	other
PROCEDURAL POSTURE	After a jury returned a defense verdict in Plaintiff's civil-rights and tort action, Defendant's oral motions for judgment as a matter of law under Federal Rule of Civil Procedure 50(a), made at the close of Plaintiff's and Defendant's cases, were decided by the court.
STANDARD OF REVIEW	Judgment as a matter of law is proper when a party has been fully heard and a reasonable jury would not have a legally sufficient evidentiary basis to find for that party. The court applies the same standard as on summary judgment, viewing the evidence in the light most favorable to the nonmoving party, drawing all reasonable inferences in that party's favor, and refraining from credibility determinations or weighing the evidence.
PRECEDENTIAL VALUE	Unknown

TOPICS

- motion for directed verdict
- section 1983
- negligence
- evidence
- civil procedure

PRACTICE AREAS

civil procedure

civil rights

torts

evidence

QUESTIONS PRESENTED

1. Whether Defendant was entitled to judgment as a matter of law on the negligence and § 1983 claims for lack of evidence of causation.
2. Whether Defendant was entitled to judgment as a matter of law on the battery claim for lack of evidence of intent.
3. Whether Defendant was entitled to judgment as a matter of law on the § 1983 excessive-force claim for lack of evidence that Defendant used unreasonable or excessive force.
4. Whether the court could decide the pending Rule 50(a) motions after taking them under advisement, submitting the case to the jury, and receiving the jury's verdict.

HOLDINGS

1. When the court takes a Rule 50(a) motion under advisement and submits the case to the jury, it may later decide the legal questions raised by the motion under Rule 50(b), even if the defendant merely re-raises the motion at the close of the defendant's case rather than formally renewing it after the verdict.
2. The evidence was sufficient for a reasonable jury to find that Defendant caused Plaintiff's injury; judgment as a matter of law was therefore denied on causation.
3. Defendant was not entitled to judgment as a matter of law on the battery claim because his argument conceded that evidence existed to support the element of intent, and credibility questions were for the jury.
4. Defendant was not entitled to judgment as a matter of law on the excessive-force claim because an eyewitness's testimony that Defendant used force against Plaintiff provided a sufficient basis for a reasonable jury to find that the force was greater than necessary under the circumstances.

KEY QUOTATIONS

“The Rule 50 standard is the same as the standard for granting a motion for summary judgment.” (at 2)

“Thus, when considering a Rule 50 motion, the court must view the evidence in the light most favorable to the nonmoving party, “draw all reasonable inferences in that party’s favor, and it may not make credibility determinations or weigh the evidence.”” (at 2)

“Questions regarding the credibility of that evidence is for the jury to decide, not this Court.” (at 4)

“Defendant essentially asks this Court to engage in credibility determinations that are reserved for the jury.”
(at 5)

FACTUAL BACKGROUND

On June 18, 2022, Fernando Corona was floating the Salt River with friends and became involved in a physical fight while waiting in line for a return bus. Maricopa County Sheriff's Office personnel, including Matthew

Hunter, responded. Corona injured his knee and alleged that Hunter struck it with a baton. At trial, a deputy testified that he saw Hunter strike Corona's knee, while the defense argued that Corona injured himself by falling during the fight.

PROCEDURAL HISTORY

Plaintiff sued Defendant, alleging that Defendant struck Plaintiff's knee with a baton during a fight, causing injury and constituting battery, negligence, and excessive force under 42 U.S.C. § 1983. The court previously denied Defendant's motion for summary judgment because a genuine dispute existed regarding whether Defendant struck Plaintiff's knee. After both parties presented their cases at trial, Defendant moved for judgment as a matter of law; the court took the motions under advisement, submitted the matter to the jury, and the jury returned a full defense verdict. The court denied the pending Rule 50(a) motions.

DISPOSITION

other

CASES CITED

- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 250–52 (1986)
- Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 150 (2000)
- Craten v. Foster Poultry Farms Inc., No. CV-15-02587-PHX-DLR, 2018 WL 4492287 (D. Ariz. Sept. 19, 2018)
- Jarrett v. Ryan, No. CV-17-01589-PHX-JAT (CDB), 2019 WL 2076045, at *7 (D. Ariz. May 10, 2019)
- Seals v. Mitchell, No. CV-04-3764-NJV, 2011 WL 1399245, at *12 (N.D. Cal. Apr. 13, 2011)
- Sampson v. Surgery Ctr. of Peoria, 491 P.3d 1115, 1119 (Ariz. 2021)
- Petolicchio v. Santa Cruz County Fair & Rodeo Ass'n, Inc., 866 P.2d 1342, 1348 (Ariz. 1994)
- Robertson v. Sixpence Inns of Am., Inc., 789 P.2d 1040, 1047 (Ariz. 1990)

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