

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Juan Hernández-Sánchez, et al. v. Hospital San Cristóbal, et al.

Hernández-Sánchez · No. Civil No. 22-1656 (JAG) · Decided March 18, 2026

SUMMARY

The United States District Court for the District of Puerto Rico granted defendants’ motions in limine to exclude plaintiffs’ expert witness, Dr. Edwin Miranda Aponte, in an action involving EMTALA and medical malpractice claims. The court found that Dr. Miranda lacked sufficient qualifications and that his opinions were unreliable, conclusory, contradictory, and unsupported by an established standard of care or reliable methodology. The court entered the Memorandum and Order on March 18, 2026.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	Jay A. Garcia-Gregory
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	March 18, 2026
DOCKET	Civil No. 22-1656 (JAG)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved in limine to exclude Plaintiffs' medical expert under Federal Rule of Evidence 702 and related expert-disclosure and reliability standards. The court granted the motions and excluded the expert testimony.
STANDARD OF REVIEW	The court applied Federal Rule of Evidence 702 to determine whether the expert was qualified, whether his specialized knowledge would assist the trier of fact, whether his opinions rested on sufficient facts and reliable principles and methods, and whether he reliably applied those principles and methods to the facts.
PRECEDENTIAL VALUE	unpublished
PARTIES	Juan Hernández-Sánchez, et al., Plaintiffs v. Hospital San Cristóbal, et al., Defendants

TOPICS

- expert testimony
- daubert standard
- motion in limine
- medical malpractice
- health law

PRACTICE AREAS

evidence

health law

medical malpractice

civil procedure

QUESTIONS PRESENTED

1. Whether Dr. Miranda was qualified under Federal Rule of Evidence 702 to provide expert testimony concerning the alleged delay in surgery and the applicable medical standard of care.
2. Whether Dr. Miranda's report and testimony were based on sufficient facts and reliable principles and methods and reliably applied those principles and methods to the facts.
3. Whether Dr. Miranda's opinions supported Plaintiffs' EMTALA screening and stabilization claims.

HOLDINGS

1. Dr. Miranda's proposed expert testimony was inadmissible under Federal Rule of Evidence 702 because the record did not establish that his specialized knowledge would assist the jury on the surgical-timing and medical-negligence issues, and his qualifications and current medical knowledge were inadequate for those issues.
2. Dr. Miranda's medical-malpractice opinions were inadmissible because his report did not identify the applicable standard of care or provide a reliable basis for concluding that Defendants deviated from it.
3. Dr. Miranda's EMTALA opinions were inadmissible because they were conclusory and mutually contradictory, and his own report showed that the patient's screening and stabilization claims were unsupported.

KEY QUOTATIONS

“to be admissible under Rule 702, an expert’s opinion must be supported by appropriate validation and rest on more than subjective belief or unsupported speculation.” (12)

“The Court finds that Dr. Miranda’s unsupported conclusions and contradictions render his expert report unreliable and would confuse the jury instead of assisting them in understanding the facts and evidence of this case.” (12)

FACTUAL BACKGROUND

Plaintiffs' expert, Dr. Edwin Miranda Aponte, offered opinions concerning the treatment and surgery of the decedent at Hospital San Cristóbal, including alleged EMTALA violations and medical negligence based on the timing of surgery. The expert had no current medical license, had not completed certified or uncertified continuing medical education for approximately ten years, had never held hospital admitting privileges, had no training in surgery or internal medicine, had never performed or decided whether to perform the type of surgery at issue, and reported that approximately 90 percent of his professional practice was administrative. His report characterized the patient as stable on arrival and receiving medical attention, but also opined that hospital personnel failed to stabilize an emergency and that surgery should have occurred earlier.

PROCEDURAL HISTORY

Plaintiffs brought EMTALA and medical-malpractice claims arising from an alleged delay in medical services and surgery. Before trial, Quality Health Services of Puerto Rico, Inc., doing business as Hospital San Cristóbal, and Dr. José A. Cebollero Marcucci moved to exclude Plaintiffs' expert, Dr. Edwin Miranda Aponte; Dr. José Ariel Torres Ramírez joined the request. The district court granted the motions in limine because the expert lacked sufficient qualifications for the issues presented and his report and testimony were unreliable, conclusory, contradictory, and unsupported by an applicable standard of care.

DISPOSITION

other

CASES CITED

- Gaydar v. Sociedad Instituto Gineco Quirúrgico y Planificación, 345 F.3d 15, 24-25 (1st Cir. 2003)
- Cartagena-Nieves v. Mennonite Gen. Hosp., Civ. No. 23-1126(JAG)
- Cruz-Vazquez v. Mennonite Gen. Hosp., 613 F.3d 54, 57 (1st Cir. 2010)
- Pages-Ramirez v. Ramirez-Gonzalez, 605 F.3d 109, 115-16 (1st Cir. 2010)
- Rolon-Alvarado v. San Juan, 1 F.3d 74, 78 (1st Cir. 1993)
- Del Carmen Guadalupe v. Negron Agosto, 299 F.3d 15, 21 (1st Cir. 2002)
- Ramos-Cruz v. Centro Médico Del Turabo, 642 F.3d 17, 18 (1st Cir. 2011)
- Lopez-Soto v. Hawayek, 175 F.3d 170, 172-73 (1st Cir. 1999)
- Correa v. Hosp. San Francisco, 69 F.3d 1184, 1192 (1st Cir. 1995)
- Reynolds v. MaineGeneral Health, 218 F.3d 78, 83-84 (1st Cir. 2000)
- Estate of Rivera v. Doctor Susoni Hosp., Inc., 288 F. Supp. 2d 161, 165 (D.P.R. 2003)
- Cintrón v. Hosp. Comunitario El Buen Samaritano, Inc., 597 F. Supp. 3d 515, 533 (D.P.R. 2022)
- Torres Otero v. Hosp. Gen. Menonita, Inc., 115 F. Supp. 2d 253, 260 (D.P.R. 2000)
- Alvarez-Torres v. Ryder Mem. Hosp., Inc., 582 F.3d 47, 52 (1st Cir.)
- Rodriguez v. Hosp. San Cristobal, Inc., 91 F.4th 59, 70-71 (1st Cir. 2024)
- Doucette v. Jacobs, 106 F.4th 156, 169 (1st Cir. 2024)
- Guile v. United States, 422 F.3d 221, 227 (5th Cir. 2005)