

SUPREME COURT OF ALABAMA

Ex parte Addiction & Mental Health Services, Inc. (In re Anthony Stepter v. Bradford Health Services)

948 So. 2d 533 (Ala. 2006) · No. 1041820 · Decided July 7, 2006

SUMMARY

The Supreme Court of Alabama denied Bradford Health Services' petition for a writ of mandamus seeking transfer of a patient's action from Tuscaloosa County to Jefferson County under the Alabama Medical Liability Act. The court held that the Act's venue provision applies only to claims involving medical malpractice or medical injury, and that the patient's claims concerning disclosure of confidential treatment information did not involve medical injuries. Accordingly, the trial court properly denied the motion to transfer.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	Nabers, Chief Justice; See, Justice; Lyons, Justice; Harwood, Justice; Woodall, Justice; Stuart, Justice; Smith, Justice; Bolin, Justice
JURISDICTION	Alabama
DECIDED	July 7, 2006
DOCKET	1041820
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Bradford Health Services petitioned for a writ of mandamus directing the Tuscaloosa Circuit Court to transfer Stepter's action to the Jefferson Circuit Court under the Alabama Medical Liability Act's venue provision.
STANDARD OF REVIEW	Mandamus is an extraordinary writ available only when the petitioner has a clear legal right to the requested order, the respondent has an imperative duty to perform accompanied by a refusal, no other adequate remedy exists, and the court's jurisdiction is properly invoked.
PRECEDENTIAL VALUE	Published Alabama Supreme Court opinion; precedential.
PARTIES	Addiction & Mental Health Services, Inc., d/b/a Bradford Health Services v. Anthony Stepter

TOPICS

venue appellate procedure civil procedure health law statutory interpretation

PRACTICE AREAS

civil procedure health law appellate procedure statutory interpretation

QUESTIONS PRESENTED

1. Whether Stepter's claims against Bradford were actions for medical injury governed by the Alabama Medical Liability Act.
2. Whether the Alabama Medical Liability Act's venue provision required transfer of the action from Tuscaloosa County to Jefferson County.
3. Whether Bradford had a clear legal right to mandamus relief from the trial court's denial of its motion to transfer.

HOLDINGS

1. The Alabama Medical Liability Act does not apply to every claim arising out of a relationship between a health-care provider and a patient; it applies only to medical-malpractice actions seeking redress for a medical injury in the context of a patient-doctor or patient-hospital relationship.
2. The Alabama Medical Liability Act's venue provision did not apply because Stepter's claims did not seek redress for medical injuries; therefore, the action was not required to be transferred to Jefferson County under that provision.
3. Bradford was not entitled to a writ of mandamus because it failed to demonstrate a clear legal right to transfer of the action.

KEY QUOTATIONS

"Mandamus is a drastic and extraordinary writ to be issued only where there is (1) a clear legal right in the petitioner to the order sought; (2) an imperative duty upon the respondent to perform, accompanied by a refusal to do so; (3) the lack of another adequate remedy; and (4) properly invoked jurisdiction of the Court." (534)

"[T]he [AMLA] applies 'only to medical-malpractice actions,' Mock v. Allen, 783 So. 2d 828, 832 (Ala.2000), 'in the context of patient-doctor and patient-hospital relationships.'" (535)

FACTUAL BACKGROUND

Bradford operated inpatient health-care facilities, and Anthony Stepter was a patient at its adult residential facility in Jefferson County. Stepter alleged that Bradford disclosed confidential treatment information when treatment documents were left where others could see them and when a Bradford employee disclosed information to Stepter's employer. He asserted invasion-of-privacy, breach-of-contract, and breach-of-fiduciary-duty claims, alleging economic, reputational, employment-related, physical, mental, and emotional injuries.

PROCEDURAL HISTORY

Stepter sued Bradford in the Tuscaloosa Circuit Court for invasion of privacy, breach of contract, and breach of fiduciary duty based on alleged disclosure of confidential treatment information. Bradford moved to transfer the action to Jefferson County under the Alabama Medical Liability Act or, alternatively, to dismiss. The trial court denied the motion, and Bradford sought mandamus relief in the Supreme Court of Alabama.

DISPOSITION

writ_denied

CASES CITED

- Ex parte Maye, 799 So. 2d 944, 946 (Ala. 2001)
- Ex parte Mardis, 628 So. 2d 605, 606 (Ala. 1993)
- Ex parte Ben-Acadia, Ltd., 566 So. 2d 486, 488 (Ala. 1990)
- Ex parte Sawyer, 892 So. 2d 898, 901 (Ala. 2004)
- Clements v. John Alvan Stewart, P.C., 595 So. 2d 858, 862 (Ala. 1992)
- Mobile Infirmary v. Delchamps, 642 So. 2d 954, 957 (Ala. 1994)
- Taylor v. Smith, 892 So. 2d 887, 893 (Ala. 2004)
- Mock v. Allen, 783 So. 2d 828, 832 (Ala. 2000)
- Thomasson v. Diethelm, 457 So. 2d 397, 399 (Ala. 1984)
- George H. Lanier Hospital v. Andrews, 901 So. 2d 714, 720-21 (Ala. 2004)