

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

**Olivia Valadez, successor in interest to the Estate of Eric Valadez v.
Sutter Health Memorial Hospital Los Banos, et al.**

Valadez · No. 1:22-cv-00263 KJM-EPG · Decided September 22, 2025

SUMMARY

The court reconsidered its prior summary judgment ruling in an EMTALA action arising from a hospital patient's elopement and subsequent suicide. It held that the hospital's nurse expert was qualified to offer an opinion but that her opinion was conclusory and contradicted by the medical record. The court therefore reached the same result, granting plaintiff summary judgment on the EMTALA duty-to-stabilize claim while leaving the negligence claim for trial.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 22, 2025
DOCKET	1:22-cv-00263 KJM-EPG
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Hospital moved under Federal Rule of Civil Procedure 60(b)(6) for reconsideration of the court's prior partial summary judgment order granting plaintiff summary judgment on her EMTALA failure-to-stabilize claim.
STANDARD OF REVIEW	Reconsideration under Federal Rule of Civil Procedure 60(b)(6) is appropriate upon a showing of newly discovered evidence, clear error, or an intervening change in controlling law. Clear error requires a definite and firm conviction that a mistake has been committed. On summary judgment, the court determines whether a genuine dispute of material fact exists, views the evidence in the light most favorable to the nonmoving party, and draws reasonable inferences in that party's favor.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

TOPICS

motion for reconsideration

summary judgment

health law

ada / disability

civil procedure

PRACTICE AREAS

health law

disability discrimination

civil procedure

summary judgment

QUESTIONS PRESENTED

1. Whether the court should reconsider its prior summary judgment ruling because it failed to expressly consider the Hospital's expert report and deposition.
2. Whether, after considering the Hospital's expert evidence, a genuine dispute of material fact existed concerning the Hospital's duty to provide stabilizing treatment under EMTALA.
3. Whether the Hospital's expert evidence created a material factual dispute regarding the Hospital's obligation to restrain Valadez to prevent elopement and self-injury.

HOLDINGS

1. Reconsideration was warranted in part because the court committed clear error by failing to expressly consider the Hospital's expert report and deposition and by incorrectly stating that the Hospital had provided no expert rebuttal.
2. After reconsideration and express consideration of the Hospital's expert evidence, plaintiff remained entitled to summary judgment on her EMTALA failure-to-stabilize claim because the expert's opinion was conclusory and contradicted by the undisputed medical records.
3. The Hospital's expert opinion did not create a genuine dispute concerning the Hospital's obligation to restrain a person on a 5150 hold to prevent elopement and self-injury.

KEY QUOTATIONS

“The court thus grants defendants’ motion for reconsideration to the extent it proceeds to reconsider its decision on plaintiff’s motion for summary judgment of plaintiff’s EMTALA duty to stabilize claim taking account of Callagy’s expert opinion.” (at 4)

“In sum, having considered expressly Callagy’s expert opinion and her deposition testimony, the court finds plaintiff’s motion for summary judgment on the EMTALA failure to stabilize claim should still be granted.” (at 6)

“The court thus denies the Hospital’s motion for reconsideration of its decision on summary judgment, and clarifies that after reconsideration plaintiff’s motion for summary judgment (ECF No. 57) is granted with respect to plaintiff’s duty to stabilize claim under EMTALA.” (at 7)

FACTUAL BACKGROUND

Eric Valadez was treated at Sutter Health Memorial Hospital Los Banos on March 21-22, 2021, after being placed on a 5150 hold for danger to himself. During his stay, his condition worsened; a psychiatrist documented paranoia and prescribed antipsychotic medication, and a nurse documented that he was paranoid and apprehensive. Valadez later eloped from the Hospital and committed suicide. The Hospital's expert, emergency-

services nurse Patrice Callagy, opined that Valadez did not need additional medication or stabilizing treatment, but the court found that opinion conclusory and inconsistent with material portions of the medical record.

PROCEDURAL HISTORY

Plaintiff sued the Hospital alleging violations of EMTALA, the ADA, the Unruh Civil Rights Act, the California Disabled Persons Act, and negligence per se. On July 7, 2025, the court granted the Hospital summary judgment on the EMTALA screening claim and several state and federal disability claims, while granting plaintiff summary judgment on the EMTALA failure-to-stabilize claim. The Hospital sought reconsideration, arguing that the court had failed to consider its expert's report and deposition. The court granted reconsideration only to expressly consider that evidence, but reaffirmed plaintiff's summary judgment on the failure-to-stabilize claim; the parties were directed to proceed to trial on the negligence claim.

DISPOSITION

other

CASES CITED

- United States v. Rezzonico, 32 F. Supp. 2d 1112, 1116 (D. Ariz. 1998)
- Marlyn Nutraceuticals, Inc. v. Mucos Pharma GmbH & Co., 571 F.3d 873, 880 (9th Cir. 2009)
- 389 Orange St. Partners v. Arnold, 179 F.3d 656, 665 (9th Cir. 1999)
- Smith v. Clark Cnty. Sch. Dist., 727 F.3d 950, 955 (9th Cir. 2013)
- United States v. U.S. Gypsum Co., 333 U.S. 364, 395 (1948)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 255 (1986)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 587-88 (1986)
- Adickes v. S.H. Kress & Co., 398 U.S. 144, 157 (1970)
- In Re Worlds of Wonder Sec. Litig., 35 F.3d 1407, 1425 (9th Cir. 1994)
- In Re Apple Computer Sec. Litig., 886 F.2d 1109, 1116 (9th Cir. 1989)