

COURT OF APPEALS OF MARYLAND

Baltimore County, Maryland v. Michael Quinlan, 466 Md. 1

215 A.3d 282 (2019) · No. No. 50, September Term, 2018 · Decided August 26, 2019

SUMMARY

The Maryland Court of Appeals held that degenerative medial and lateral meniscal tears suffered by a paramedic could qualify as a compensable occupational disease under Maryland's Workers' Compensation Act. The court concluded that the nature of the paramedic's employment involved hazards placing the employee at greater risk of degenerative knee conditions and that sufficient evidence supported the jury's finding that the condition arose from the employment. The court also upheld the denial of the employer's motion for summary judgment.

CASE DETAILS

COURT	Court of Appeals of Maryland
WRITING FOR THE COURT	Adkins, J.; Barbera, C.J.; Greene, J.; McDonald, J.; Watts, J.; Hotten, J.; Getty, J.; Sally D. Adkins, Senior Judge, Specially Assigned
JURISDICTION	Maryland
DECIDED	August 26, 2019
DOCKET	No. 50, September Term, 2018
DISPOSITION	affirmed
PROCEDURAL POSTURE	Baltimore County sought review of a jury verdict awarding workers' compensation benefits to Michael Quinlan for degenerative meniscal tears claimed as an occupational disease. The Court of Appeals reviewed the denial of the County's summary-judgment motion and the legal sufficiency of the occupational-disease claim after the Court of Special Appeals affirmed the circuit court judgment.
STANDARD OF REVIEW	The denial of summary judgment was reviewed for abuse of discretion because the trial court had discretion to deny summary judgment in favor of a full hearing on the merits. Issues concerning construction and application of the workers' compensation statute were reviewed as questions of law, without deference to the lower court's legal conclusions.
PRECEDENTIAL VALUE	Published precedential opinion of the Court of Appeals of Maryland
PARTIES	Baltimore County, Maryland v. Michael Quinlan

TOPICS

workers compensation

occupational safety and health

statutory interpretation

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the circuit court abused its discretion by denying Baltimore County's motion for summary judgment based on the characterization and evidentiary support of Quinlan's occupational-disease claim.
2. Whether degenerative tears of the medial and lateral menisci could qualify as an occupational disease under Maryland Labor and Employment Article § 9-502(d).
3. Whether the evidence permitted the jury to reasonably conclude that Quinlan's degenerative meniscal tears were due to the nature of his employment and incurred as a result of that employment.

HOLDINGS

1. The circuit court did not abuse its discretion by denying Baltimore County's motion for summary judgment because the record presented a material factual dispute and the court could properly allow a full hearing on the merits.
2. Degenerative meniscal tears may qualify as an occupational disease under Maryland Labor and Employment Article § 9-502(d) when the nature of the employment exposes the employee to hazards of the disease to a greater degree than the general public and the employee's job functions expose the employee to those hazards.
3. The evidence was sufficient for the jury to reasonably conclude that Quinlan's degenerative meniscal tears were due to the nature of his paramedic employment and incurred as a result of that employment.

KEY QUOTATIONS

“Determining applicability under this section can be divided into two steps. First, the court must identify the professional tasks of the specific employee, remembering that “function outweighs form.”” (at 12-13)

“As a matter of law, degenerative meniscal tears should not be excluded from the universe of occupational diseases.” (at 25)

“Therefore, the jury was within its power to find that Quinlan “sustain[ed] an occupational disease of right knee degenerative tears of the . . . medial and lateral menisci . . . arising out of and in the course of his employment[.]”” (at 25)

FACTUAL BACKGROUND

Michael Quinlan worked as a Baltimore County paramedic for 24 years and performed numerous emergency-response tasks, including repetitive kneeling, bending, climbing, carrying equipment, lifting and moving

patients, and using stairs. He developed degenerative tears in the medial and lateral menisci of his right knee and underwent surgery. Medical testimony included evidence that paramedic/firefighters face a substantially increased risk of degenerative knee conditions and that Quinlan's repetitive job duties caused or contributed to his condition, although the County's expert attributed primary causation to age and weight.

PROCEDURAL HISTORY

Quinlan filed a workers' compensation claim with the Maryland Workers' Compensation Commission in October 2015. The Commission disallowed the claim, but Quinlan sought circuit-court review and a jury trial. The Circuit Court for Baltimore County denied the County's motion for summary judgment, and the jury found that Quinlan sustained compensable occupational disease arising out of his employment. The Court of Special Appeals affirmed, and the Court of Appeals granted certiorari and affirmed the judgment.

DISPOSITION

affirmed

CASES CITED

- Liggett & Meyers Tobacco Co. v. Goslin, 163 Md. 74, 80 (1932)
- Housing Authority of Baltimore City v. Woodland, 438 Md. 415, 426 (2014)
- Presbyterian University Hospital v. Wilson, 337 Md. 541, 549 (1995)
- Metropolitan Mortgage Fund, Inc. v. Basiliko, 288 Md. 25, 28 (1980)
- Barnes v. Greater Baltimore Medical Center, Inc., 210 Md. App. 457, 487 (2013)
- Kent Village Associates Joint Venture v. Smith, 104 Md. App. 507, 516-17 (1995)
- Scott v. State, 454 Md. 146, 188 (2017)
- Shah v. Howard County, 337 Md. 248, 254 (1995)
- Uninsured Employers' Fund v. Danner, 388 Md. 649, 659 (2005)
- Victory Sparkler & Specialty Co. v. Francks, 147 Md. 368, 378-79 (1925)
- LeCompte v. United Parcel Service, Inc., 90 Md. App. 651, 654, 658 (1992)
- Davis v. Dynacorp, 336 Md. 226, 227, 236-37 (1994)
- Lettering Unlimited v. Guy, 321 Md. 305, 306, 311 (1990)
- King v. Board of Education of Prince George's County, 354 Md. 369, 381-82 (1999)
- Foble v. Knefely, 176 Md. 474, 486 (1939)
- Black & Decker Corp. v. Humbert, 189 Md. App. 171, 174, 186-91 (2009)
- Allied-Signal, Inc. v. Bobbitt, 96 Md. App. 157, 167-69 (1993), rev'd on other grounds, 334 Md. 347 (1994)
- Means v. Baltimore County, 344 Md. 661, 662, 670 (1997)
- Bridgett v. Montgomery County, 186 Md. App. 616, 628 (2009)
- Miller v. Western Electric Co., 310 Md. 173, 176 (1987)
- Baltimore County v. Quinlan, 238 Md. App. 486, 508-09 (2018)

