

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

Christine Kaiser v. Vamsi Krishna Kunam and Tenet Hospitals, Ltd.
d/b/a The Hospitals of Providence Transmountain Campus

Kaiser · No. No. 2:25-cv-00557-KG-JHR · Decided February 13, 2026

SUMMARY

The United States District Court for the District of New Mexico denies defendants’ motions to dismiss for lack of personal jurisdiction and their alternative requests to transfer the action to the Western District of Texas. The court concludes that the plaintiff made a prima facie showing of specific personal jurisdiction based on the defendants’ alleged provision of regional medical services to New Mexico residents and that exercising jurisdiction is reasonable. The court also denies a motion to strike and finds duplicative motions moot.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
WRITING FOR THE COURT	Kenneth J. Gonzales
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	February 13, 2026
DOCKET	No. 2:25-cv-00557-KG-JHR
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to dismiss the amended complaint for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2), or alternatively to transfer the action to the United States District Court for the Western District of Texas under 28 U.S.C. § 1631. The court denied the motions and denied as moot duplicative motions by Tenet Hospitals; it also denied a motion to strike.
STANDARD OF REVIEW	At the pleading stage, where the jurisdictional motion is decided on affidavits and written materials without an evidentiary hearing, the plaintiff need only make a prima facie showing of personal jurisdiction, and factual disputes are resolved in the plaintiff's favor.
PRECEDENTIAL VALUE	Unknown

TOPICS

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QUESTIONS PRESENTED

1. Whether the District of New Mexico had general personal jurisdiction over Dr. Kunam and Tenet Hospitals.
2. Whether the defendants had sufficient minimum contacts with New Mexico to support specific personal jurisdiction.
3. Whether exercising specific personal jurisdiction would offend traditional notions of fair play and substantial justice.
4. Whether the action should be transferred to the Western District of Texas under 28 U.S.C. § 1631.
5. Whether Tenet Hospitals' duplicative motions to dismiss should be denied as moot and whether Dr. Kunam's motion to strike should be denied.

HOLDINGS

1. The District of New Mexico lacks general personal jurisdiction over the defendants because Tenet Hospitals is formed under Texas law with its principal place of business in Texas, Dr. Kunam resides and practices in Texas, and the alleged operation of hospitals in New Mexico by Tenet Hospitals' parent company does not make the defendants at home in New Mexico.
2. The District of New Mexico has specific personal jurisdiction over the defendants because Kaiser made a prima facie showing that the defendants purposefully directed activities toward New Mexico residents and that her injuries arose out of or related to those forum-directed activities.
3. Exercising specific personal jurisdiction over the defendants in New Mexico is reasonable and does not offend traditional notions of fair play and substantial justice.
4. Transfer to the Western District of Texas under 28 U.S.C. § 1631 is unwarranted because the District of New Mexico has personal jurisdiction over the defendants and there is no jurisdictional defect requiring a transfer.

KEY QUOTATIONS

“Taken as true at the pleading stage, these allegations establish the minimum contacts needed for specific personal jurisdiction.”

FACTUAL BACKGROUND

Kaiser sought treatment at Gila Regional Medical Center in Silver City, New Mexico, and was transferred hospital-to-hospital by air ambulance to Tenet Hospitals' facility in El Paso, Texas, because southern New Mexico was within the facility's service area. At the Texas facility, Dr. Kunam performed a procedure to place a biliary drain, after which Kaiser developed neurological symptoms and an intracerebral hemorrhage. Kaiser

alleged that the defendants negligently failed to recognize, diagnose, and treat an impending stroke and that Tenet Hospitals was vicariously liable for its employees' acts or omissions.

PROCEDURAL HISTORY

Christine Kaiser filed an amended complaint alleging negligent medical care by Vamsi Krishna Kunam and Tenet Hospitals following her transfer from a New Mexico hospital to a Texas hospital. Defendants challenged personal jurisdiction and sought alternative transfer. The District of New Mexico concluded that it lacked general jurisdiction but had specific personal jurisdiction and declined to transfer the case.

DISPOSITION

other

CASES CITED

- *AST Sports Science, Inc. v. CLF Distribution, Inc.*, 514 F.3d 1054, 1056 (10th Cir. 2008)
- *Wenz v. Memery Crystal*, 55 F.3d 1503, 1505 (10th Cir. 1995)
- *International Shoe Co. v. State of Washington*, *International Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945)
- *Shrader v. Biddinger*, 633 F.3d 1235, 1239 (10th Cir. 2011)
- *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 414-15 (1984)
- *Old Republic Insurance Co. v. Continental Motors, Inc.*, 877 F.3d 895, 904 (10th Cir. 2017)
- *Goodyear Dunlop Tires Operations, S.A. v. Brown*, 564 U.S. 915, 919 (2011)
- *In re Packaged Seafood Products Antitrust Litigation*, 338 F. Supp. 3d 1118, 1139 (S.D. Cal. 2018)
- *Daimler AG v. Bauman*, 571 U.S. 117, 118 (2014)
- *Dudnikov v. Chalk & Vermilion Fine Arts, Inc.*, 514 F.3d 1063, 1070-71 (10th Cir. 2008)
- *Sanders v. Ball*, 1999 WL 397921, at *3 (E.D. La.)
- *Kenerson v. Stevenson*, 604 F. Supp. 792, 795 (D. Me. 1985)
- *Four Corners Health Care Corp. v. Roots Home Health Care*, 2021 WL 3856086, at *1 (D. Utah)
- *Everhart v. Children's Hospital*, 2008 WL 11451893, at *1, *11-*12 (D.N.M.)
- *Asahi Metal Industry Co. v. Superior Court of California*, 480 U.S. 102, 113 (1987)
- *Heidt v. Heidt*, 2009 WL 10700005, at *8 (D.N.M.)
- *Trujillo v. Williams*, 465 F.3d 1210, 1223 (10th Cir. 2006)

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