

SUPREME COURT OF TEXAS

IHS Cedars Treatment Center of DeSoto, Texas, Inc. v. Mason

143 S.W.3d 794 (Tex. 2004) · Decided June 18, 2004

SUMMARY

The Texas Supreme Court considered whether alleged negligent discharge, treatment, supervision, and hospital procedures proximately caused injuries sustained by a former mental-health patient in a car accident involving another former patient. Assuming without deciding that the defendants owed and breached relevant duties, the court held that the alleged conduct was too attenuated to constitute cause in fact and therefore proximate cause as a matter of law. The court reversed the court of appeals as to the physician, charge nurse, and hospital and rendered judgment that the plaintiff take nothing.

CASE DETAILS

COURT	Supreme Court of Texas
WRITING FOR THE COURT	Justice Wainwright
JURISDICTION	Texas
DECIDED	June 18, 2004
DISPOSITION	reversed
PROCEDURAL POSTURE	The Texas Supreme Court granted petitions for review of a divided court of appeals decision reversing summary judgment for Ramos, Marx, and Cedars Hospital and remanding Mason's claims.
STANDARD OF REVIEW	Summary judgment is proper when the movant conclusively negates at least one essential element of a cause of action. On review, the court takes as true all evidence favorable to the nonmovant, indulges every reasonable inference in the nonmovant's favor, and resolves doubts in the nonmovant's favor.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Texas.
PARTIES	Teofilo Moses Ramos, Sandra Duryea Marx, Cedars Hospital v. Jodi Marie Mason

TOPICS

medical malpractice

proximate cause

summary judgment

negligence

vicarious liability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the alleged negligent treatment, discharge, assessment, or failure to provide discharge procedures by Ramos, Marx, and Cedars Hospital was the cause in fact and proximate cause of Mason's injuries.
2. Whether the alleged negligence merely furnished a condition that made the accident possible and was therefore too attenuated to satisfy the substantial-factor test for proximate cause.
3. Whether expert testimony concerning causation created a genuine issue of material fact sufficient to defeat summary judgment.
4. Whether Cedars Hospital could be held vicariously liable for alleged negligence by Ramos and Marx when their conduct was not a proximate cause of Mason's injuries.

HOLDINGS

1. Assuming without deciding that Ramos, Marx, and Cedars Hospital owed and breached the asserted duties, their conduct was too remote from the accident to constitute cause in fact or proximate cause as a matter of law.
2. Ramos's alleged negligent care, treatment, or discharge did not proximately cause Mason's injuries because it merely provided Mason the opportunity to leave the hospital and spend time with Thomas.
3. Marx's alleged failure to fully inform Ramos about Mason's simultaneous discharge with Thomas and her allegedly improper discharge assessment were not the cause in fact of Mason's injuries.
4. Cedars Hospital's alleged failure to provide adequate policies and procedures for voluntary discharges was not the cause in fact of Mason's injuries as a matter of law.
5. Cedars Hospital was not vicariously liable because the alleged acts and omissions of Ramos and Marx did not proximately cause Mason's injuries.
6. The expert testimony did not create a genuine issue of material fact because it failed to establish a sufficient causal nexus between the alleged breaches and Mason's injuries; conclusory causation opinions are insufficient to defeat summary judgment.

KEY QUOTATIONS

“Our precedents establish that merely creating the condition that makes harm possible falls short as a matter of law of satisfying the substantial factor test.” (800)

“Ramos had a duty of reasonable care in treating Mason, but he did not become an insurer of Mason’s post-discharge well-being for any dangerous circumstance in which she may place herself, notwithstanding the acts of other parties.” (801)

FACTUAL BACKGROUND

Mason voluntarily entered Cedars Hospital for treatment of depression and was discharged at her request on August 16, 1993, earlier than scheduled. She left with her roommate, Thomas, another patient who had also been discharged, and approximately twenty-eight hours later Thomas suffered a psychotic episode while driving at high speed, causing a single-car accident that paralyzed Mason. Mason alleged that her physician, the charge nurse, and the hospital negligently treated or discharged her and failed to implement or follow adequate discharge procedures.

PROCEDURAL HISTORY

The trial court granted summary judgment for the defendants and rendered a final judgment on all causes of action, concluding that any alleged negligence was not the proximate cause of Mason's injuries. The court of appeals reversed summary judgment as to Ramos, Marx, Cedars Hospital, and the Minirth-Meier Clinic, while affirming portions of the judgment involving Meier. The Texas Supreme Court severed and remanded the claims against the Minirth-Meier Clinic pursuant to the parties' settlement, then reversed as to Ramos, Marx, and Cedars Hospital and rendered judgment that Mason take nothing.

DISPOSITION

reversed

CASES CITED

- Southwestern Elec. Power Co. v. Grant, 73 S.W.3d 211, 215 (Tex. 2002)
- Elliott-Williams Co. v. Diaz, 9 S.W.3d 801, 803 (Tex. 1999)
- Sci. Spectrum, Inc. v. Martinez, 941 S.W.2d 910, 911 (Tex. 1997)
- Friendswood Dev. Co. v. McDade & Co., 926 S.W.2d 280, 282 (Tex. 1996)
- D. Houston, Inc. v. Love, 92 S.W.3d 450, 454 (Tex. 2002)
- Travis v. City of Mesquite, 830 S.W.2d 94, 98 (Tex. 1992)
- Doe v. Boys Clubs of Greater Dallas, Inc., 907 S.W.2d 472, 477 (Tex. 1995)
- Union Pump Co. v. Allbritton, 898 S.W.2d 773, 774-76 (Tex. 1995)
- Lear Siegler, Inc. v. Perez, 819 S.W.2d 470, 471-72 (Tex. 1991)
- Bell v. Campbell, 434 S.W.2d 117, 118, 120, 122 (Tex. 1968)
- McIntyre v. Ramirez, 109 S.W.3d 741, 749-50 (Tex. 2003)
- Coastal Transp. Co. v. Crown Cent. Petroleum Corp., 136 S.W.3d 227, 281 (Tex. 2004)
- Mercer v. Daoran Corp., 676 S.W.2d 580, 583 (Tex. 1984)