

DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Kyle Matthew Hill v. State of Florida

Hill · No. 2D2025-1955 · Decided March 18, 2026

SUMMARY

The Florida Second District Court of Appeal denied Kyle Matthew Hill’s petition for a writ of certiorari challenging an order permitting the State to subpoena his medical records. The court held that the competency issue did not bar the discovery hearing because Hill had not been adjudicated incompetent and the hearing was not a material stage of the criminal proceeding. The court also concluded that the State established a sufficient nexus between the requested records and its theory that Hill was intoxicated when the crash occurred.

CASE DETAILS

COURT	District Court of Appeal of Florida, Second District
WRITING FOR THE COURT	LaROSE, J.; NORTHCUTT, J.; SLEET, J.
JURISDICTION	District Court of Appeal of Florida, Second District
DECIDED	March 18, 2026
DOCKET	2D2025-1955
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Petition for writ of certiorari seeking review of a circuit court order permitting the State to subpoena the petitioner's medical records.
STANDARD OF REVIEW	Certiorari review is extraordinary and requires a departure from the essential requirements of law, material injury for the remainder of the case, and an injury that cannot be corrected by postjudgment appeal. The jurisdictional irreparable-harm elements must be analyzed first. A departure from the essential requirements of law requires more than a simple legal error and entails a violation of a clearly established legal principle resulting in a miscarriage of justice.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Kyle Matthew Hill v. State of Florida

TOPICS

- writ of certiorari
- medical records privacy
- criminal procedure
- appellate procedure
- evidence

PRACTICE AREAS

criminal procedure

appellate procedure

constitutional privacy

evidence

QUESTIONS PRESENTED

1. Whether the circuit court was barred from conducting the medical-records subpoena hearing because Hill's competency to proceed was in doubt.
2. Whether the hearing on the State's subpoenas was a material stage of the criminal proceeding under Florida Rule of Criminal Procedure 3.210(a).
3. Whether the State established the required nexus between Hill's medical records and a material issue in the criminal case.
4. Whether the circuit court's order departed from the essential requirements of law so as to warrant certiorari relief.

HOLDINGS

1. Florida Rule of Criminal Procedure 3.210(a) did not bar the subpoena proceedings because Hill had not been adjudicated incompetent; a single confidential expert evaluation was insufficient to constitute the competency determination required by the governing statute and rules.
2. The hearing concerning the State's medical-records subpoenas was not a material stage of the criminal proceeding under Florida Rule of Criminal Procedure 3.210(a)(1).
3. The State established the required nexus and compelling need for Hill's medical records by presenting a reasonable theory that Hill was intoxicated when the crash occurred and evidence, including the charging documents, accident circumstances, and reported blood-alcohol concentration, making it reasonable to expect the records to contain supporting evidence.
4. Certiorari relief was not warranted because the circuit court's order did not depart from the essential requirements of law.

KEY QUOTATIONS

"The petitioner must 'demonstrate that the contested order constitutes '(1) a departure from the essential requirements of the law, (2) resulting in material injury for the remainder of the case[,] (3) that cannot be corrected on postjudgment appeal.'" (at 3)

"'[A] person accused of an offense . . . who is mentally incompetent to proceed at any material stage of a criminal proceeding must not be proceeded against while incompetent.'" (at 5)

"'When the State seeks a subpoena for medical records, the court can rely on the State's argument and the accident report or probable cause affidavit to establish relevance.'" (at 8)

FACTUAL BACKGROUND

Hill was charged with offenses arising from a vehicle collision in which another vehicle left the roadway and struck a pole, killing a passenger and injuring the driver. Police suspected Hill was intoxicated, and EMS and

hospital personnel drew his blood. The State subpoenaed the related medical records, while Hill objected and asserted that a traumatic brain injury made him incompetent to proceed. The circuit court found the records sufficiently relevant and ordered the subpoenas to issue.

PROCEDURAL HISTORY

The State indicted Hill for first-degree murder, attempted first-degree murder, DUI manslaughter, and DUI with serious bodily injury. After the State subpoenaed EMS and hospital records, including blood-draw results, Hill objected. The circuit court overruled the objections and ordered the subpoenas to issue. Hill petitioned the Second District for certiorari, which denied the petition.

DISPOSITION

writ_denied

CASES CITED

- Hunter v. State, 639 So. 2d 72, 74 (Fla. 5th DCA 1994)
- Walter v. Page, 638 So. 2d 1030, 1031 (Fla. 2d DCA 1994)
- American Prime Title Services, LLC v. Wang, 317 So. 3d 1183, 1186 (Fla. 3d DCA 2021)
- Board of Trustees of Internal Improvement Trust Fund v. American Educational Enterprises, LLC, 99 So. 3d 450, 454-55 (Fla. 2012)
- Hett v. Barron-Lunde, 290 So. 3d 565, 569 (Fla. 2d DCA 2020)
- Plantz v. John, 170 So. 3d 822, 824 (Fla. 2d DCA 2015)
- Foster v. State, 326 So. 3d 1192, 1196 (Fla. 1st DCA 2021)
- Gomillion v. State, 267 So. 3d 502, 506, 508-09 (Fla. 2d DCA 2019)
- Paylan v. Fitzgerald, 223 So. 3d 431, 434 (Fla. 2d DCA 2017)
- Allstate Insurance v. Kaklamanos, 843 So. 2d 885, 889 (Fla. 2003)
- Dougherty v. State, 149 So. 3d 672, 676 (Fla. 2014)
- McCray v. State, 71 So. 3d 848, 862 (Fla. 2011)
- State v. Johnson, 814 So. 2d 390, 393 (Fla. 2002)
- Barker v. Barker, 909 So. 2d 333, 337 (Fla. 2d DCA 2005)
- State v. Tavenese, 321 So. 3d 252, 255 (Fla. 4th DCA 2021)
- Guardado v. State, 61 So. 3d 1210, 1213 (Fla. 4th DCA 2011)
- Leka v. State, 283 So. 3d 853, 859 (Fla. 2d DCA 2019)
- McAlevy v. State, 947 So. 2d 525, 530 (Fla. 4th DCA 2006)