

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Frutoz v. Valley Children's Hospital

No. 1:25-cv-00016-JLT-SAB (E.D. Cal. June 26, 2025) · No. 1:25-cv-00016-JLT-SAB · Decided June 26, 2025

SUMMARY

Findings and recommendations from the United States District Court for the Eastern District of California concerning Valley Children’s Hospital’s motion to dismiss claims arising from the treatment and death of a pediatric patient. The court recommends denying the motion as to the plaintiffs’ EMTALA medical-screening and stabilization claims and their claim under California Health and Safety Code section 1317, while recommending partial dismissal of the requested punitive damages.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Stanley A. Boone
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 26, 2025
DOCKET	1:25-cv-00016-JLT-SAB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs brought claims under EMTALA, California Health and Safety Code § 1317, California medical-negligence law, and California's wrongful-death statute. Defendant Valley Children's Hospital moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The magistrate judge issued findings and recommendations recommending that the motion be granted in part and denied in part, subject to review by the assigned district judge.
STANDARD OF REVIEW	On the Rule 12(b)(6) motion, the court accepted well-pleaded factual allegations as true and construed the complaint in the light most favorable to plaintiffs, disregarding conclusory allegations, unwarranted deductions, and unreasonable inferences. Dismissal was appropriate only if the complaint lacked a cognizable legal theory or sufficient factual allegations to support one. The Rule 12(b)(1) jurisdictional challenge was evaluated in light of the adequately pleaded federal EMTALA claim and supplemental jurisdiction under 28 U.S.C. § 1367(a).

PRECEDENTIAL VALUE

Nonprecedential; magistrate judge findings and recommendations subject to district-judge review

TOPICS

motions to dismiss

health law

medical malpractice

subject matter jurisdiction

statutory interpretation

PRACTICE AREAS

health law

medical malpractice

civil procedure

torts

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged that Valley Children's Hospital violated EMTALA's requirement to provide an appropriate medical screening examination.
2. Whether the amended complaint plausibly alleged an EMTALA stabilization claim, including facts supporting actual detection or knowledge of an emergency medical condition.
3. Whether the amended complaint plausibly alleged a claim under California Health and Safety Code § 1317.
4. Whether dismissal for lack of subject-matter jurisdiction or declining supplemental jurisdiction was warranted if the state claims remained related to the federal EMTALA claim.
5. Whether plaintiffs' prayer for punitive damages should be dismissed.

HOLDINGS

1. A plaintiff plausibly alleges an EMTALA screening claim by alleging that the hospital failed to provide an examination comparable to examinations given to similarly situated patients presenting with similar symptoms; an improper motive is not required.
2. The complaint plausibly alleged an EMTALA stabilization claim where it alleged facts supporting an inference that the Hospital or its agents actually detected or knew of an emergency medical condition and failed to provide treatment required to stabilize it.
3. The complaint plausibly alleged a claim under California Health and Safety Code § 1317 by alleging that the Hospital failed to exercise reasonable care in screening decedent and diagnosed her condition but did not provide subsequent treatment because it determined the condition was not an emergency.
4. Because plaintiffs plausibly stated an EMTALA claim, federal-question jurisdiction existed and the court could exercise supplemental jurisdiction over the related state-law claims.
5. The punitive-damages prayer should be dismissed with prejudice because plaintiffs did not oppose the Hospital's request for its dismissal.

KEY QUOTATIONS

“a hospital satisfies EMTALA’s ‘appropriate medical screening’ requirement if it provides a patient with an examination comparable to the one offered to other patients presenting similar symptoms.” (at 8)

“The adequate medical screening is for the very purpose to determine whether an emergency medical condition exists. Only if an emergency medical condition exists, and a hospital detects it, then does the stabilization requirement trigger.” (at 10)

FACTUAL BACKGROUND

Nine-year-old Teresa Hagan presented to Valley Children's Hospital's emergency department with prolonged high fever, tachycardia, periorbital swelling, lethargy, altered mental status, nausea, and laboratory abnormalities allegedly indicating a severe bacterial infection. Plaintiffs alleged that the Hospital discharged her after approximately seven hours without the imaging, specialty consultations, observation, or intravenous antibiotics allegedly required by its protocols. After additional visits and worsening neurological symptoms, imaging revealed a massive brain abscess; despite intensive treatment, Teresa suffered extensive brain damage and died on March 18, 2024.

PROCEDURAL HISTORY

Plaintiffs filed the action on January 3, 2025, and filed an amended complaint on March 14, 2025. Valley Children's Hospital moved to dismiss, and the district judge referred the motion to Magistrate Judge Stanley A. Boone for findings and recommendations. After briefing and a June 18, 2025 hearing, the magistrate judge recommended dismissal with prejudice of the punitive-damages prayer while allowing the EMTALA, California Health and Safety Code § 1317, and jurisdictional claims to proceed.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Somers v. Apple, Inc., 729 F.3d 953, 959-60 (9th Cir. 2013)
- Rowe v. Educ. Credit Mgmt. Corp., 559 F.3d 1028, 1029-30 (9th Cir. 2009)
- In re Gilead Scis. Sec. Litig., 536 F.3d 1049, 1055 (9th Cir. 2008)
- Saloojas, Inc. v. Aetna Health of Cal., Inc., 80 F.4th 1011, 1014 (9th Cir. 2023)
- Baker v. Adventist Health, Inc., 260 F.3d 987, 992, 995 (9th Cir. 2001)
- Jackson v. East Bay Hosp., 246 F.3d 1248, 1255-60 (9th Cir. 2001)
- Eberhardt v. City of Los Angeles, 62 F.3d 1253, 1257-59 (9th Cir. 1995)
- Roberts v. Galen of Virginia, Inc., 525 U.S. 249 (1999)
- Cleland v. Bronson Health Care Group, Inc., 917 F.2d 266, 272 (6th Cir. 1990)
- A. J. T. v. Osseo Area Schools, Indep. Sch. Dist. No. 279, 605 U.S. ___, ___ S. Ct. ___, 2025 WL 1657415, at *6 (2025)
- Summers v. Baptist Medical Center Arkadelphia, 91 F.3d 1132, 1140 (8th Cir. 1996)

- *Starr v. Baca*, 652 F.3d 1202, 1216 (9th Cir. 2011)
- *San Diegans for Open Government v. Pub. Facilities, Fin. Auth. of the City of San Diego*, 8 Cal. 5th 733, 739, 455 P.3d 311 (2019)
- *Brooker v. Desert Hosp. Corp.*, 947 F.2d 412, 415 (9th Cir. 1991)
- *Hoffman v. Tonnemacher*, 425 F. Supp. 2d 1120 (E.D. Cal. 2006)
- *Bryant*, 289 F.3d 1162
- *Battle ex rel. Battle v. Memorial Hosp. at Gulfport*, 228 F.3d 544 (5th Cir. 2000)
- *Correa v. Hospital San Francisco*, 69 F.3d 1184 (1st Cir. 1995)
- *Romar ex rel. Romar v. Fresno Community Hosp. & Medical Center*, 583 F. Supp. 2d 1179 (E.D. Cal. 2008)
- *Wilkerson v. Wheeler*, 772 F.3d 834, 839 (9th Cir. 2014)
- *Baxter v. Sullivan*, 923 F.2d 1391, 1394 (9th Cir. 1991)

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