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NO. 97783-6

SUPREME COURT OF THE STATE OF WASHINGTON

DOUG HERMANSON, an individual,

Respondent/Cross-Appellant,

v.

MULTICARE HEALTH SYSTEM, INC., a Washington Corporation d/b/a TACOMA GENERAL HOSPITAL, JANE and JOHN DOES 1-10 and their marital communities comprised thereof,

Petitioner/Cross-Respondent.

MULTICARE HEALTH SYSTEM, INC.'S REPLY TO DOUG HERMANSON'S RESPONSE TO PETITION FOR REVIEW AND CROSS-PETITION FOR REVIEW

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I. IDENTITY OF REPLYING PARTY

Petitioner MultiCare Health System, Inc., d/b/a Tacoma General Hospital (MultiCare) submits this Reply to Doug Hermanson's Response to Petition for Review and Cross-Petition for Review, in which he seeks review of issues not raised in MultiCare's Petition for Review.

II. FACTUAL REPLY

In his Response and Cross-Petition (Response), Mr. Hermanson makes a number of representations that are factually inaccurate or mis-characterize the record.

In his "Overview of Case and Court of Appeals Decision," Mr. Hermanson erroneously claims, *Response at 1*, "MultiCare does not deny it breached Mr. Hermanson's privilege and disclosed to the Tacoma Police Department without a warrant his confidential health care information." He similarly erroneously claims, *Response at 16*, "[i]t appears undisputed the social worker disclosed Mr. Hermanson's confidential health care information without a warrant." While Social Worker Van Slyke noted in the medical records that she "consulted with law enforcement," her note says nothing about what she communicated. CP 88. Whether she or anyone else at MultiCare improperly disclosed Mr. Hermanson's health care information are factual questions that remain to be decided by the trier of fact.

The same is true of all of Mr. Hermanson's other claims, such as

negligence, defamation, and false imprisonment, against MultiCare. All involve disputed questions of fact that a trier of fact has yet to resolve. Thus, whatever Mr. Hermanson means by the "core facts," his assertion, *Response at 2*, that "[t]he core facts are undisputed" is not true.

Mr. Hermanson persists, as he did below, in erroneously asserting, *Response at 3*, that no one – not the police or any health care provider – detected any odor of intoxicants or impaired behavior. Such assertions are belied by the facts that (1) the police report indicates that police were told that "the odor of intoxicates [sic] was noticeable," CP 81; (2) his medical records list his chief complaint as "s/p [status post] MVC [motor vehicle collision]while intoxicated," *App. to Resp. Br. at 21*; (3) alcohol intoxication was one of his primary diagnoses, *see, e.g., App. to Resp. Br. at 21, 27, 28, 33, 39, 80-88*, CP 555; (4) on admission to the emergency department his blood alcohol level was 330, *see, e.g.*, CP 547, 555, *App. to Resp. Br. at 24, 32, 38, 44, 62*; and (5) his fall risk assessment indicates "Intoxicated" "Yes," *App. to Resp. Br. at 73*.

Mr. Hermanson also suggests, *Response at* 3, MultiCare is incorrect in stating that he denied having consumed alcohol, claiming that he told the social worker and a CT tech that he did. Yet, as the medical records reveal, Mr. Hermanson did initially deny alcohol use, although he later admitted to a nurse upon return from his CT scan to having had "two beers," and still

later told the social worker that he and his wife had a beer together in Everett, *see* CP 88; *App. to Resp. Br. at 29, 35, 42, 43, 44*. Neither of those admissions, however, explain a blood alcohol level of 330.

More directly relevant to the issues raised in his cross-petition, Mr. Hermanson erroneously asserts, *Response at 1-2,* the Court of Appeals has allowed MultiCare's counsel "ex parte contact without limitation of all Mr. Hermanson's non-physician care providers employed by Multicare."[1] That is not the case. Indeed, the Court of Appeals explicitly stated that "the corporate attorney-client privilege does not allow for unlimited communication" in this case and that "MultiCare's corporate attorney-client privilege is subject to the limitations set forth in *Youngs*." *Slip Op*. at 25 (citing *Youngs v. PeaceHealth*, 179 Wn.2d 645, 316 P.3d 1035 (2014)).

III. ARGUMENT IN REPLY

In its Petition for Review, MultiCare has sought review of that portion of the Court of Appeals' decision interpreting "the spirit" of the concurrence/dissent in *Youngs* and the majority's decision in *Newman v. Highland Sch. Dist. No. 203*, 186 Wn.2d 769, 381 P.3d 1188 (2016), to

[1] *See also Response at 16* (where Mr. Hermanson erroneously argues that the Court of Appeals ordered that "defense counsel may have unrestricted communications with [the social worker] about all her health care of Mr. Hermanson without limitation"). It should be noted that the only health care the social worker provided to Mr. Hermanson was during the emergency room visit from which his claims arise. She, like Dr. Patterson and the other trauma team members, had no prior or subsequent involvement in Mr. Hermanson's care and thus has no unrelated, irrelevant, privileged health care information to disclose or any ongoing health care provider-patient relationship to hinder.

affirm the trial court's order precluding MultiCare's defense counsel from having privileged ex parte communication with Dr. Patterson and to hold that MultiCare's corporate attorney-client privilege does not apply to defense counsel's communications with Dr. Patterson solely because his agency relationship with MultiCare is that of an independent contractor rather than a direct employee.

Mr. Hermanson now asks this Court, *Response at 10-18*, to accept review of the portions of the Court of Appeals' decision that (1) affirm the trial court's order allowing MultiCare's defense counsel to have privileged ex parte communications with two nurses employed by MultiCare, (2) reverse the trial court's order precluding MultiCare's counsel from having privileged ex parte communications with a social worker employed by MultiCare whose conduct forms a basis for MultiCare's alleged liability, and (3) reverse the trial court's order requiring MultiCare to obtain leave of court before contacting any other MultiCare health care providers, citing RAP 13.4(b)(1) and (4).[2] He claims, *Response at 10-18*, that the Court of Appeals decision allowing MultiCare's defense counsel to have ex parte contact with non-physicians somehow conflicts with this Court's decisions

[2] Although Mr. Hermanson also cites RAP 13.4(b)(2), he does not cite any published opinion of the Court of Appeals other than the Court of Appeals' decision in this case. Nor does he make any showing the Court of Appeals' decision in this case is in conflict with any other published Court of Appeals' decision.

in *Youngs* and *Wright v. Group Health Hosp.*, 103 Wn.2d 192, 691 P.2d 564 (1984), and raises issues of substantial public interest.

Although, as explained more fully below, MultiCare disagrees that the portions of the Court of Appeals' decision as to which Mr. Hermanson seeks review conflict with *Youngs* or *Wright*, MultiCare nonetheless believes that, just as the determination of whether *Youngs*' allowance of privileged ex parte contact between defendant hospital's counsel and nonparty employed treating physicians extends to nonparty treating physicians whose agency relationship with the hospital is that of independent contractor rather than employee presents a matter of substantial public interest that should be determined by this Court, so resolution of the questions of whether the prohibition set forth in *Loudon v. Mhyre*, 110 Wn.2d 675, 756 P.2d 138 (1988), against defense counsel having ex parte contact with plaintiff's nonparty treating physicians extends to nonparty non-physician treating health care providers, and, if so, whether, consistent with *Youngs*, the corporate attorney-client privilege trumps the *Loudon* rule and limits *Loudon*'s protections to the extent necessary to protect the corporate defendant's right to fully investigate its potential liability and defend itself against a plaintiff's claims, present matters about which this Court should provide final guidance.

A. The Court of Appeals' Decision Regarding Non-Physicians Is Not in Conflict with *Youngs*.

Mr. Hermanson argues, *Response at 10-12*, that the Court of Appeals' decision allowing MultiCare's defense counsel to have privileged ex parte communications with nonparty non-physician treating health care providers employed by MultiCare conflicts with *Youngs*. His argument in that regard is based upon his erroneous claim that this Court in *Youngs* specifically distinguished between nonparty physician employees and other nonparty non-physician employees and allowed corporate defense counsel to have attorney-client privileged ex parte communications with the former, but not the latter.

But, as the Court of Appeals correctly noted, *Slip Op. at 24*, there is no indication in *Youngs* that there were any non-physician health care providers at issue, nor did the Court in *Youngs* affirmatively rule that non-physician employees were to be treated differently than physician employees. Indeed, the *Youngs* court identified the issue presented as the issue of whether *Loudon*, "which prohibits defense counsel in a personal injury case from communicating ex parte with the plaintiff's nonparty treating physician, applies to such physicians when they are employed by a defendant." *Youngs*, 179 Wn.2d at 650. And, the plaintiffs in the cases consolidated in *Youngs* only objected to defense counsel's ex parte contacts

with "physicians" other than those whose conduct gave rise to their claims. *Id*. at 654-56.

The majority opinion in *Youngs* says nothing about whether *Loudon*'s prohibition of defense counsel having ex parte contact with plaintiff's nonparty treating physicians even applies with respect to plaintiff's other nonparty non-physician health care providers. Indeed, the concurring/dissenting opinion in *Youngs* suggests that the *Loudon* prohibition does not apply, and the corporate attorney-client privilege does apply, to those other nonparty non-physician health care providers. As the concurring/dissenting opinion states, "a corporate defendant remains free to engage in privileged communications with its employees other than the plaintiff or the plaintiff's nonparty treating physicians, before and throughout the litigation." *Youngs*, 179 Wn.2d at 680 (Stephens, J., concurring in part/dissenting in part).

Mr. Hermanson nonetheless insists, *Response at 11-12*, that because one of the trial court's orders in *Youngs* allowed ex parte communications with hospital "employees who provided health care" and *Youngs* affirmed only "the portion of the trial court's order permitting defense counsel's ex parte communications with [plaintiff's] nonparty treating physicians," the *Youngs* court must have intended to preclude ex parte contact with non-physician employees. In so arguing, Mr. Hermanson ignores the fact that

the *Youngs* court identified only two "portion[s]" of the trial court order, affirmed one and reversed one, and described both by referring to "nonparty treating physicians." *Youngs* 179 Wn.2d at 672. After quoting the trial court's order referring to "employees who provided health care to plaintiff," the *Youngs* court affirmed "the portion" regarding contact with plaintiff's "nonparty treating physicians, but only as to those physicians who have firsthand knowledge of the alleged negligent incident and only as to communications as to the facts of that incident." *Id.* As to the "portion" of the trial court's order that the *Youngs* court reversed – the Youngs court described it as allowing contact with the plaintiff's "other nonparty treating physicians (those lacking firsthand knowledge of the alleged negligent incident) and with any of [plaintiff's] nonparty treating physicians on topics other than the facts of the alleged negligent incident." *Id.*

Nothing in *Youngs* supports Mr. Hermanson's claim, *Response at 10-12*, that the *Youngs* court intended to make a material distinction between physicians and non-physicians with respect to the scope of the corporate attorney-client privilege. *See Slip Op. at 24*; *Youngs*, 179 Wn.2d at 672. Nothing in *Youngs* suggests that the Court viewed the trial court's reference to "employees who provided health care to plaintiff," *see Youngs*, 179 Wn.2d at 672, as necessarily including anyone other than the physicians who were the subjects of the plaintiff's objection based on *Loudon*.

Mr. Hermanson's insistence that a trivial difference in language between a trial court's order and this Court's statement identifying the portions of that order it intends to affirm and reverse transforms the entire meaning of the opinion makes no sense. Mr. Hermanson's position not only ignores the Court's reasoning in *Youngs*, but also is based, as the Court of Appeals recognized, *Slip Op. at 23*, on a logical fallacy. As the Court of Appeals noted: "*Youngs* does not discuss nonphysician employees. To conclude that *Youngs* does not apply because the social worker or nurses are not physicians is relying on the fallacy of the inverse." *Id.*

The Court of Appeals decision regarding non-physicians is not in conflict with *Youngs*.

B. <u>The Court of Appeals' Decision Regarding Non-Physicians Is Not in Conflict With *Wright*.</u>

Mr. Hermanson asserts, *Response* at *13-15*, that the Court of Appeals concluded that MultiCare's counsel could have ex parte contact with three non-physicians – the social worker and two nurses – "because they are 'parties,'" and that that conclusion is in conflict with *Wright*. But, Mr. Hermanson misapprehends the Court of Appeals' reasoning and incorrectly conflates the interpretation of the term "party" in attorney disciplinary rules discussed in *Wright* with that of "client" in the context of the corporate attorney-client privilege discussed in *Youngs*.

Here, the Court of Appeals, based on its view that the nurses and social workers are subject to statutory nurse-patient and social worker-patient privileges similar to the physician-patient privilege and that "the policy concerns related to the attorney-client privilege are identical," reasoned that "the corporate attorney-client privilege trumps the social worker-patient privilege or nurse-privilege 'where an ex parte interview enables corporate counsel to determine what happened to trigger the litigation.'" *Slip Op*. at 20 (quoting *Youngs*, 179 Wn.2d at 664 (internal quotations omitted)). In other words, the Court of Appeals held that, if the *Loudon* rule "prohibiting contact with 'physicians' because of the sanctity of the physician-patient privilege applies to the social worker" and nurses,[3] then the *Youngs* rule allowing corporate defense counsel to have privileged ex parte communications with "physicians" who are employees or agents of the defendant corporation and who have "direct knowledge of the event or events triggering the litigation" about "*the facts of the alleged negligent incident*" also applies to the social worker and nurses. *Slip Op. at 20-21.*

To the extent that the Court of Appeals referred to the social worker

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[3] This Court has never held that the *Loudon* prohibition on ex parte contact applies to anyone other than a plaintiff's nonparty treating physicians. In fact, the *Youngs* concurrence/dissent suggests that *Loudon* does not apply to nonparty non-physician treating health care providers, given its statement that "a corporate defendant remains free to engage in privileged communications with its employees other than the plaintiff or the plaintiff's nonparty treating physicians, before and throughout the litigation." *Youngs*, 179 Wn.2d at 680 (Stephens, J., concurring in part/dissenting in part).

and nurses as "named parties," it did so only as "further supporting the notion that the corporate attorney-client privilege extends to them." *Slip Op. at 21*. Because the single brief paragraph in which the Court of Appeals discussed this additional support is not directly related to the essential holding, it is properly viewed as dicta and is not binding. *Ass'n of Wash. Bus. v. Dep't of Revenue*, 155 Wn.2d 430, 442 n.11, 120 P.3d 46 (2005) (noting that language in an opinion is dicta if it is unnecessary to the holding in the case). In addition, because the Court of Appeals viewed the status of "named parties" as relevant to the notion that the attorney-client privilege extends to them in the context as analyzed in *Youngs*, rather than relevant to the application of the disciplinary rule at issue in *Wright*, these statements do not present a conflict with *Wright*.

In *Youngs*, this Court distinguished between a "party" and a "client," acknowledging that not every employee of a corporation is necessarily a "party" to a lawsuit naming the corporation or a "client" of the corporation's counsel. *Youngs*, 179 Wn.2d at 661. The *Youngs* court cited *Wright* for the proposition that "a 'client' under the attorney-client privilege is not necessarily a 'party' for [other] purposes." *Id*. at 661. Ultimately, however, the *Youngs* court did *not* resolve the conflict between the corporate attorney-client privilege and the *Loudon* rule on that basis. Instead, it held that the corporate defendant's attorney-client privilege extended to corporate

defense counsel's communications with certain "nonparty" physicians otherwise subject to the *Loudon* rule, as long as they had knowledge of the alleged negligent event and the communications were limited to the facts of that incident. *Youngs*, 179 Wn.2d at 661, 664.

In contrast, *Wright* did not concern the boundaries of the attorney-client privilege, but examined the reach of the disciplinary rule limiting opposing counsel's contacts with a represented "party." *Wright*, 103 Wn.2d at 202. In *Wright*, which involved a medical malpractice suit against a hospital and a physician it employed, plaintiff's counsel did *not* seek ex parte contact with the physician, who was "a joined party" in the lawsuit, but sought to interview ex parte nurses and other personnel who were not parties to the suit but were employed by the defendant hospital. *Id*. at 193, 197. The policy conflict at issue in *Wright* was between the corporate hospital defendant's need to ensure that "its agents who have the authority to prejudice the entity's interests are not unethically influenced by adverse counsel" and the adverse attorney's need for information in the exclusive control of the corporation. *Id*. at 197-98, 202. In determining which corporate employees should be viewed as "parties" for the purposes of the disciplinary rule, the *Wright* court rejected an invitation to rely on the flexible "client" test for determining the application of the attorney-client privilege because "the *policies* represented by these two rules are different."

Id. at 202; *see also Loudon*, 110 Wn.2d at 681 (*Wright* resolved different questions and did not address policy concerns involved in defense counsel's contacts with plaintiff's treating physicians); *Youngs*, 179 Wn.2d at 652 (rejecting suggestion that *Wright* resolves the conflict between *Loudon* rule and corporate attorney-client privilege).

Nothing in the Court of Appeals' opinion suggests that it misapprehended the distinction between *Wright* and *Youngs* or intended to apply the "party" analysis of *Wright* to questions regarding application of the attorney-client privilege. To the contrary, the Court of Appeals explicitly acknowledged the differences and rejected Mr. Hermanson's reliance on *Wright*, concluding that "*Wright* does not provide the framework for analyzing corporate attorney-client privilege." *Slip Op*. at 22.

Under these circumstances, whether the Court of Appeals' dicta regarding "named parties" was correct or not, the opinion is not in conflict with *Wright*.

C. Even Though the Court of Appeals' Decision Regarding Ex Parte Contact with Mr. Hermanson's Nonparty Non-Physician Treating Health Care Employees Is Not in Conflict with *Youngs* or *Wright*, MultiCare Agrees that this Court Should Make the Final Determination as to Whether *Loudon* and *Youngs* Apply to Such Nonparty Non-Physician Treating Health Care Provider Employees.

Loudon holds only that defense counsel in personal injury cases are prohibited from having ex parte contact with a plaintiff's nonparty treating

physicians. *Loudon*, 110 Wn.2d at 675-76, 682. *Loudon* says nothing about precluding defense counsel from having ex parte contact with plaintiff's nonparty non-physician treating health care providers. The majority opinion in *Youngs* also says nothing about whether the *Loudon* prohibition applies to preclude ex parte contact with a plaintiff's nonparty non-physician treating health care providers. It only addresses whether the corporate attorney-client privilege trumps the *Loudon* prohibition, so as to allow corporate defense counsel to have privileged ex parte communications about the facts of the alleged negligent event with those nonparty treating physician employees who have direct knowledge of the events triggering the litigation against the corporate defendant. *Youngs*, 179 Wn.2d at 664, 679. The concurring/dissenting opinion in *Youngs*, however, suggests that *Loudon* does not apply to nonparty non-physician treating health care providers, given its statement that "a corporate defendant remains free to engage in privileged communications with its employees other than the plaintiff or the plaintiff's nonparty treating physicians, before and throughout the litigation." *Youngs*, 179 Wn.2d at 680 (Stephens, J., concurring in part/dissenting in part).

Ultimately, this Court should make the final determination and guide all concerned with respect to whether it intends its decisions in *Loudon* and *Youngs* to extend to nonparty non-physician treating health care

providers. Similarly, this Court should make the final determination and guide all concerned as to whether it intended, as the Court of Appeals has opined, that the spirit of the dissent in *Youngs* and the rationale of the majority in *Newman* precludes application of the corporate attorney-client privilege to admitted agents of the defendant corporation simply because their agency relationship with the corporation is one of independent contractor rather than employee.

IV. CONCLUSION

For the reasons stated in MultiCare's Petition for Review, this Court should accept review of that portion of the Court of Appeals' decision that would preclude MultiCare's counsel from having privileged ex parte communications with Dr. Patterson, an admitted agent of MultiCare who has knowledge of facts concerning the alleged negligent event and whose conduct gives rise to MultiCare's alleged liability. As for the issues raised in Mr. Hermanson's cross-petition for review with regard to the portions of the Court of Appeals' decision that would allow MultiCare's counsel to have privileged ex parte communications with other non-physician health care providers employed by MultiCare, Multicare disagrees that those portions of the Court of Appeals' decision conflict with *Youngs* or *Wright*, but believes that this Court should have the final say as to whether *Loudon*

and *Youngs* even apply to such non-physician health care provider employees.

RESPECTFULLY SUBMITTED this 13th day of November, 2019.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that under the laws of the State of Washington that on the 13th day of November, 2019 I caused a true and correct copy of the foregoing document, "MultiCare Health System, Inc.'s Reply to Doug Hermanson's Response to Petition for Review and Cross-Petition for Review," to be delivered in the manner indicated below to the following counsel of record:

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