No. 324869

COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION III

LORI A. SWEENEY, and JEROLD L. SWEENEY, husband and wife,

Plaintiffs-Appellants,

vs.

ADAMS COUNTY PUBLIC HOSPITAL DISTRICT NO. 2, d/b/a EAST ADAMS RURAL HOSPITAL; and ALLEN D. NOBLE, PA-C and JANE DOES NOBLE, husband and wife and the marital community composed thereof; and JAMES N. DUNLAP, M.D. and JANE DOE DUNLAP, husband and wife and the marital community composed thereof; and PROVIDENCE HEALTH SERVICES, d/b/a PROVIDENCE ORTHOPEDIC SPECIALTIES, a Washington corporation,

Defendants-Respondents.

APPELLANTS' REPLY TO DUNLAP

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Appellants Lori Sweeney and her husband, Jerold (collectively Sweeney), submit this reply to the response brief submitted on behalf of Respondents James N. Dunlap, M.D., et ux., and his employer, Providence Hospital Services, doing business as Providence Orthopedic Specialties (collectively Dunlap).

I. REPLY TO DUNLAP'S STATEMENT OF THE CASE

A. Chronology of undisputed facts.

As discerned from the record and the briefing of the parties, the undisputed facts regarding Sweeney's claim against Dunlap can be summarized in the following timeline:

> **April 25, 2010**: Sweeney suffers a dislocated shoulder, and is treated by Allen Noble, PA-C, at East Adams Rural Hospital. After Noble unsuccessfully attempts to manipulate or "reduce" Sweeney's shoulder back into position, she is transferred to the Sacred Heart Medical Center Emergency Room in Spokane. CP 102-03; Dunlap Resp. Br., at 1, 3-5.
>
> **April 28, 2010**: Dunlap performs partial shoulder replacement surgery on Sweeney. Dunlap Resp. Br., at 5.
>
> **April 4, 2012**: Dunlap performs surgery to repair Sweeney's rotator cuff, the group of muscles and tendons that stabilizes her shoulder joint. Dunlap Resp. Br., at 5.
>
> **"At some point in 2012"**: Sweeney shows the x-rays taken before Noble attempted to reduce her shoulder to Dunlap, and it appears to be the first time he has ever seen them. CP 264; Dunlap Resp. Br., at 6.

April 9, 2013: Sweeney's lawyer writes a letter to Dunlap requesting a meeting in light of the impending expiration of the three-year limitations period for acts that occurred on April 25, 2010. CP 271.

April 19, 2013: In a meeting with Sweeney's lawyer, Dunlap denies seeing the pre-reduction x-rays of her shoulder or consulting with Noble, and states that he would not have advised Noble to attempt a closed reduction of Sweeney's shoulder if he had seen the x-rays. CP 266-69; Dunlap Resp. Br., at 6-7.

April 23, 2013: Sweeney files her lawsuit against Noble. CP 18-27; Dunlap Resp. Br., at 7.

May 7, 2013: Sweeney's lawyer writes a confirmation letter to Dunlap regarding the substance of the April 19, 2013, meeting, specifically confirming "[t]he fact that it appears you never reviewed any X-rays or spoke with PA-C Noble from East Adams Rural Hospital prior to his attempts to reduce the shoulder is a critical fact in this case." CP 275 (brackets added).

June 11, 2013: Sweeney has total shoulder replacement surgery that reveals problems with the surgeries performed by Dunlap on April 28, 2010, and April 4, 2012. CP 281-82.

July 15, 2013: Noble answers Sweeney's complaint, alleging, among other things, that Dunlap reviewed the pre-reduction x-rays and advised him to attempt a closed reduction of Sweeney's shoulder. CP 31-32.

October 23, 2013: Sweeney receives an x-ray "audit trail" document from Noble's lawyer showing that Dunlap had, in fact, seen the pre-reduction x-rays before advising Noble to attempt a closed reduction of the shoulder. CP 268; Dunlap Resp. Br., at 8. The audit trail document was not part of Sweeney's medical records and was not previously available to her. CP 269.

October 25, 2013: During a deposition taken in the course of Sweeney's lawsuit against Noble, Dunlap confirms that he previously denied seeing the pre-reduction x-rays of

Sweeney's shoulder or consulting with Noble. However, after reviewing the audit trail, he admits that he must have seen the x-rays beforehand. CP 266-68.

January 2, 2014: Sweeney files a motion to amend her complaint against Noble to add Dunlap. CP 38.

January 15, 2014: The superior court grants Sweeney's motion to amend. CP 60-61.

January 17, 2014: Dunlap's employer is timely served with a summons and Sweeney's amended complaint. CP 257.

February 24, 2014: Dunlap is timely served with a summons and Sweeney's amended complaint. CP 259-60.

B. What Sweeney knew and when she knew it.

In the introduction, restatement of the issues, argument and conclusion sections of his brief, Dunlap repeatedly claims that on April 25, 2010, Sweeney was "immediately" or "instantly" aware of Dunlap's consultation with Noble and his advice to attempt a closed reduction after reviewing the pre-reduction x-rays, all without citations to the record.[1] Similar types of statements with corresponding record citations are conspicuously absent from

[1] Dunlap Resp. Br., at 2 (introduction, stating "Ms. Sweeney was instantly aware that her claimed injuries were the result of treatment she received on April 25, 2010, and she was immediately aware of Dr. Dunlap's role in that treatment"); *accord id.* at 3 (restatement of issues, asserting that "Ms. Sweeney was immediately aware that her injury resulted from the April 25, 2010 treatment, and she was immediately aware of Dr. Dunlap's role in that treatment"); *id.* at 11 (argument section, contending "[n]o matter how [the] facts are construed, Ms. Sweeney's claim against Dr. Dunlap had accrued immediately—that is, it accrued on April 25, 2010"; brackets added); *id.* at 13, 17 (argument section, making similar statements); *id.* at 26 (conclusion, stating the "claim accrued immediately .... and Ms. Sweeney had all the requisite knowledge immediately"; ellipses added).

Dunlap's statement of the facts and statement of the case. *See* Dunlap Resp. Br., at 3-10.

In his statement of facts, Dunlap contends that, approximately two years later—i.e., "[s]ometime in 2012"—during a meeting between Sweeney and Dunlap, "there was no dispute or doubt regarding Dr. Dunlap's role in [Sweeney's] care." *See* Dunlap Resp. Br., at 6 (brackets added; citing CP 264, internal ¶ 13). The portion of the record cited in support of this contention is a declaration from Sweeney's lawyer, which states:

> In discussing the case with Mr. Sweeney, I learned that at some point in 2012 he had obtained a complete copy of the entire set of x-ray images ordered by PA-C Noble. Concerned about the condition of his wife and suspecting medical negligence on the part of PA-C Noble, Mr. Sweeney showed Dr. Dunlap the x-rays. Mr. Sweeney advised me that Dr. Dunlap held up one of the pre-reduction x-rays and asked him in a shocked tone: "Where did you get this?" According to Mr. Sweeney, it appeared to him that something was wrong and that this was the first time Dr. Dunlap had seen the pre-reduction x-rays.

CP 264 (internal ¶ 13). This record evidence contradicts Dunlap's contention because the fact Dunlap did not have the pre-reduction x-rays in his possession, and appeared to be unfamiliar with them suggests (wrongly, we now know) that he did not advise Noble to attempt a closed reduction of Sweeney's shoulder after reviewing them.

Dunlap further contends that Sweeney's lawyer had her medical records when he met with Dunlap on April 19, 2013, and that "[t]hose medical records demonstrate that Dr. Dunlap had access to some of Ms. Sweeney's pre-reduction x-rays[.]" Dunlap Resp. Br., at 6 (citing CP 265, brackets added). This fact is undisputed, but it is incomplete and misleading. The medical record in question, Noble's chart note from April 25, 2010, states:

> I called Dr. Dunlap (ortho) at this point and he reviewed films on stentor. He recommended us attempting closed reduction.

CP 102 (parentheses in original.) The note prompted Sweeney's lawyer to meet with Dunlap to specifically inquire whether Dunlap had seen the pre-reduction x-rays and advised Noble to attempt a closed reduction. CP 266. Before the meeting, there was uncertainty about whether the consultation documented in Noble's chart note had actually occurred because Dunlap did not have any record of the consultation, and he had previously expressed surprise when Sweeney showed him the pre-reduction x-rays. CP 264-65.

During the meeting with Sweeney's lawyer, Dunlap denied reviewing the pre-reduction x-rays, confirmed that the x-rays were not in the computer database where they would have been stored if he had reviewed them, and denied any memory of speaking with

Noble before the attempted reduction. CP 266-69. Dunlap further made the incriminating admission that he would not have advised Noble to attempt a closed reduction of Sweeney's shoulder if he had seen the x-rays, lending further credence to his denials and the inference based on his lack of records. CP 267; *see also* CP 226-28 (Dunlap deposition).

In sum, the record does not support Dunlap's claim that Sweeney was "instantly" or "immediately" aware of Dunlap's consultation with Noble and his advice to attempt a closed reduction after reviewing the pre-reduction x-rays. At most, the record establishes that Sweeney had Noble's chart note an unspecified time before April 19, 2013, when her lawyer met with Dunlap. While the chart note indicates that Noble consulted with Dunlap, Dunlap denied the substance of the note and provided additional information tending to indicate that the note was incorrect.

C. The treatment that Dunlap provided.

Dunlap performed two surgeries on Sweeney's shoulder. The first was a partial replacement of her right shoulder on April 28, 2010, and the second was a rotator cuff repair on April 4, 2012. Dunlap claims that these surgeries are "unrelated" to each other.

Dunlap Resp. Br., at 5; *accord id.* at 19 & 21 (arguing first and second surgeries are unrelated). In particular, Dunlap claims that the first surgery "was successful in every respect" and that Sweeney fully recovered, and that the second surgery was for "a separate and distinct injury." *Id.* at 5 (citing CP 336 and RP 41). In support of this claim, he cites his own summary judgment reply brief and the argument of his counsel in the superior court, rather than evidence. *See* CP 336 (summary judgment brief); RP 41 (argument of counsel).

At the cited pages of the record, Dunlap's summary judgment brief refers to testimony from one of Sweeney's experts, Steven R. Graboff, M.D. CP 336 (citing ¶¶ 5(d) & (e) of Dr. Graboff's declaration). The cited testimony from Dr. Graboff contains a summary of Sweeney's medical history describing the Dunlap's first surgery as a "well-placed cemented hemiarthroplasty." CP 278 (internal ¶¶ 5(d) & (e)). This testimony does not establish that the first surgery was successful in every respect, that Sweeney fully recovered, or that the second surgery was for a separate and distinct injury.

In actuality, Dr. Graboff's declaration refutes Dunlap's claims in some detail. Although the first surgery was "well-placed"

to begin, within less than six months, on of October 19, 2010, the top of the arm bone (humeral head) was out of place. CP 279 (Graboff decl., ¶ 5(f); brackets added). Within less than nine months, on January 3, 2012, an x-ray documented rotator cuff problems, with the humeral head even further out of place than before. CP 279 (Graboff decl., ¶ 5(g); brackets added). Dunlap's second surgery did not fix the problem. Rotator cuff problems continued and the humeral head remained out of place. CP 279 (Graboff decl., ¶ 5(h)). These facts led Dr. Graboff to conclude that the first surgery performed by Dunlap had "failed" because he did not inspect or repair Sweeney's rotator cuff at that time, and the second surgery was unsuccessful because he failed to properly repair the rotator cuff. CP 281-82 (Graboff decl., ¶¶ 16-18 & 19(G)).

Consistent with Dr. Graboff's testimony, Sweeney's amended complaint alleges negligence on the part of Dunlap, including "complications and continuing problems resulting from [his] continuing treatment," resulting in failure of the partial shoulder replacement surgery performed by Dunlap and rotator cuff deficiency in Sweeney's shoulder, ultimately requiring her to undergo total shoulder replacement surgery. CP 51-52 (internal ¶¶ 5.30 & 5.33; brackets added).

II. ARGUMENT IN REPLY TO DUNLAP

A. Dunlap has failed to satisfy his burden of proof on summary judgment regarding the statute of limitations defense.

On review of summary judgment, Dunlap does not dispute that he must point to evidence supporting every element of his statute of limitations defense and demonstrate that there are no genuine issues of material fact in dispute, given that he bears the burden of proof on the statute of limitations defense. *See* Sweeney App. Br., at 22. Dunlap agrees that, under the medical negligence statute of limitations, RCW 4.16.350, Sweeney is entitled to three years from the date of the act or omission alleged to have caused injury, or one year from the date of actual or constructive knowledge that the injury was caused by such act or omission, whichever is longer. *See* Dunlap Resp. Br., at 11.

1. There can be no legitimate dispute that Sweeney's amended complaint is timely as to the second surgery performed by Dunlap because the complaint was filed within three years of the surgery.

Because review of summary judgment is de novo, the court should hold as a matter of law that Sweeney's amended complaint against Dunlap, which was filed on January 15, 2014, is timely under the three-year limitation period as to the second surgery

performed by Dunlap on April 4, 2012. *See* Sweeney App. Br., at 35 n.19. Sweeney has alleged negligence by Dunlap with respect to this surgery, and the allegation is supported by evidence in the record. CP 51 (amended complaint, ¶¶ 5.30 & 5.33); CP 281-83 (Graboff decl., ¶¶ 16-18 & 19(F)).

2. Sweeney's amended complaint is timely as to all related negligent acts under the continuing treatment doctrine, and Dunlap has not met his burden to prove that his advice to attempt a closed reduction of her shoulder and the first surgery are unrelated to the second surgery.

The Court should also hold as a matter of law that Dunlap's advice to attempt a closed reduction of Sweeney's shoulder and his first surgery are sufficiently related to his second surgery satisfy the continuing treatment doctrine. *See* Sweeney App. Br., at 31-36. Dunlap acknowledges that a cause of action for medical negligence does not accrue until the date of the last related negligent treatment. *See* Dunlap Resp. Br., at 19-21 (discussing *Caughell v. Group Health Coop.*, 124 Wn. 2d 217, 876 P.2d 217 (1994)). There is no dispute about the nature of the rule, merely its application to the facts of this case. *See id.*

Although Dunlap argues that the closed reduction and first surgery are unrelated to the second surgery, his arguments are

unsupported by any competent evidence in the record. *See* Dunlap Resp. Br., at 5 (statement of facts); *id*. at 19-21 (argument). Sweeney has alleged that all of these acts were negligent and related, supported by evidence in the record. All of the treatment was provided for Sweeney's shoulder as a result of the injuries she suffered on April 25, 2010. Not only is there no contrary evidence, there is no indication that Dunlap's treatment stopped until after the second surgery, nor is there any indication of treatment by other providers during the intervening time. In light of the record, there is no genuine issue of material fact in dispute, and Sweeney's complaint is therefore timely as to all related negligent acts on the part of Dunlap.

3. With respect to the one-year limitations period based on discovery, Dunlap should not be allowed to rely on Noble's chart note to establish constructive knowledge that he advised Noble to attempt a closed reduction of her shoulder after seeing the pre-reduction x-rays, when he subsequently denied talking to Noble or seeing the x-rays.

As with the continuing treatment doctrine, Dunlap acknowledges accrual based on discovery under RCW 4.16.350, and he does not dispute the nature of the rule, only its application to the facts of this case. *See* Dunlap Resp. Br., at 16-19 (distinguishing *Winbun v. Moore,* 143 Wn. 2d 206, 18 P.3d 576 (2001), and *Adcox*

v. Children's Ortho. Hosp. & Med. Ctr., 123 Wn. 2d 15, 864 P.2d 921 (1993)). With respect to Dunlap's advice to attempt a closed reduction of her shoulder based on the pre-reduction x-rays, Sweeney did not have actual knowledge until receiving the "audit trail" document on October 23, 2013, showing that he saw the x-rays, and taking Dunlap's deposition two days later, on October 25, 2013, which confirmed that he had previously misled Sweeney's lawyer.

Dunlap seems to be arguing that Sweeney should be deemed to have had constructive knowledge of Dunlap's conduct when she received Noble's chart note documenting the consultation between him and Dunlap.[2] As an initial matter, the date when Sweeney received a copy of the chart note is not reflected in the record, although it appears that Sweeney's lawyer had it when he met with Dunlap on April 19, 2013. This date is still within the one-year limitations period based on discovery.

In any event, using the chart note to establish constructive knowledge under the circumstances present in this case would be contrary to the purposes of the discovery rule, as articulated in

[2] The chart note does not reflect that Noble informed Sweeney about his consultation with Dunlap when she received treatment on April 25, 2010. CP 102-03.

Winbun, 143 Wn. 2d at 220-22. *See also* Sweeney App. Br., at 25-27. In particular, it would be contrary to the principle "that no action should be filed until specific acts or omissions can be attributed to a particular defendant," and it would promote the "shoot first, ask questions later" litigation style that the Supreme Court has rejected. *See Webb v. Neuroeducation Inc.*, 121 Wn. App. 336, 345, 88 P.3d 417 (2004), *rev. denied,* 153 Wn. 2d 1004 (2005).

Dunlap tries to distinguish *Winbun* on grounds that the plaintiff in that case did not receive all of her medical records, and was alone and heavily sedated during the treatment at issue. *See* Dunlap Resp. Br., at 16. However, these facts make the case analogous rather than providing a basis for making distinctions. Just as the plaintiff in *Winbun* did not receive all of her medical records, Sweeney did not receive the x-ray audit trail document. In both cases, the omitted documents were "significant" and "obscured" the plaintiffs' ability to determine liability. *See* 143 Wn. 2d at 216-17. And, while the plaintiff in *Winbun* was sedated, Sweeney was similarly incapacitated by the pain resulting from her injuries and the unsuccessful reductions of her shoulder attempted by Noble. CP 102-03.

Dunlap tries to distinguish *Adcox* on grounds that the injured person in that case was a child and therefore lacking capacity. *See* Dunlap Resp. Br., at 18. This distinction is immaterial because the Court's reasoning did not hinge upon the minority of the injured person. Instead, the Court affirmed a verdict finding that the mother, who brought claims individually and as guardian of her child, did not have constructive knowledge of negligence on the part of a hospital and nursing staff because she had been informed that her child's injuries resulted from a heart condition rather than their conduct. *See* 123 Wn. 2d at 35. In a similar way, the statements made by Dunlap during his meeting with Sweeney's lawyer on April 19, 2013, should preclude constructive knowledge in this case.

To the extent necessary, the rule of *Winbun* and *Adcox* should be applied here, and the Court should hold that Sweeney did not have constructive knowledge of Dunlap's conduct before she received the audit trail document and took his deposition. Because she amended her complaint to add Dunlap and his employer as

additional defendants within one year of discovery, her claims are timely.[3]

B. Dunlap misapprehends the requirements for relation back.

Dunlap does not dispute the de novo standard of review for relation back of amendments under CR 15(c). *See* Dunlap Resp. Br., 10-11 (regarding standard of review); *id.* at 21-26 (regarding relation back under CR 15(c)); *see also* Sweeney App. Br., at 36-37; *Martin v. Dematic*, — Wn. 2d —, 2014 WL 7447612, at *3 (Dec. 31, 2014) (stating "[w]e clarify that the standard of review for CR 15(c) determinations is de novo"). Dunlap appears to agree regarding the requirements for relation back. *Compare* Sweeney App. Br., at 37 *with* Dunlap Resp. Br., at 21-22. However, he argues that Sweeney cannot satisfy the requirements based upon mistake and lack of inexcusable neglect. *See* Dunlap Resp. Br., at 22-26.[4]

Initially, Dunlap misapprehends the mistake requirement. The requirement is grounded in the text of CR 15(c)(2), which

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[3] It may not be necessary to reach this issue if the court finds Sweeney's complaint timely as to all related negligent acts under the continuing violation doctrine, discussed above.

[4] Dunlap does not address the requirement of CR 15(c)(1) that the party added by amendment "has received such notice of the institution of the action that he will not be prejudiced in maintaining his defense on the merits[.]" Presumably, this is because Dunlap received notice of the lawsuit within three years of Sweeney's injury. The prospect of a lawsuit was specifically discussed between Sweeney's lawyer and Dunlap on April 19, 2013, and referenced in letters from the lawyer to Dunlap before and after the meeting. *See* Sweeney App. Br., at 38 (citing Dunlap's summary judgment memorandum, CP 158-61).

requires that "the party to be brought in by the amendment … knew or should have known that, but for a mistake concerning the identity of the proper party, the action would have been brought against him." (Ellipses added.) The rule thus requires actual or constructive knowledge on the part of "the party to be brought in by the amendment" that he or she was omitted by mistake. However, Dunlap seems to interpret the rule as requiring the plaintiff to have actual or constructive knowledge of the mistake. *See* Dunlap Resp. Br., at 23 (arguing "there is no colorable argument that Ms. Sweeney was mistaken regarding the defendants' identities"). Dunlap does not dispute that, he should have known that he would have been named as a defendant in the original complaint if he had told Sweeney's lawyer that he told Noble to attempt the closed reduction of her shoulder after seeing the x-rays. *See* Sweeney App. Br., at 38-39.

Dunlap also appears to misapprehend the requirement for relation back based on a lack of inexcusable neglect. The Supreme Court has recently clarified that:

> the defendant bears the initial burden of showing neglect by producing evidence that the defendant's identity was easily ascertainable by the plaintiff. Once the defendant has produced that evidence, the burden shifts to the plaintiff to give a reason for failing to ascertain the identity of the defendant. If the plaintiff

> fails to give a reasonable excuse or show that he or she exercised due diligence, it is inexcusable neglect.

Martin, 2014 WL 7447612, at *4. Dunlap incorrectly suggests that the initial burden falls on the plaintiff to show due diligence or a lack of inexcusable neglect. *See* Dunlap Resp. Br., at 16 & 21-22.

Under the circumstances, Dunlap cannot show that his identity as a culpable party was "easily ascertainable." However, even if he could meet this initial burden, it is a reasonable excuse for Sweeney and her lawyer to rely on Dunlap's statements that he did not advise Noble to attempt a closed reduction of Sweeney's shoulder after seeing the pre-reduction x-rays. They had no reason to doubt the truthfulness or accuracy of these statements. As noted in Sweeney's opening brief, "the inexcusable neglect standard should not be applied to preclude relation back under CR 15(c) where the defendant actions or misrepresentations mislead the plaintiff." Sweeney App. Br., at 39 (quoting *Gildon v. Simon Prop. Grp., Inc.*, 158 Wn. 2d 483, 492 n.10, 145 P.3d 1196 (2006)). Dunlap has not addressed *Gildon*, nor has he dealt with the fact that his own conduct caused Sweeney to omit him as a defendant from the original complaint.

III. CONCLUSION

Summary judgment in favor of Dunlap should be reversed, and the summary judgment order should be vacated. On de novo review, this Court should instead grant summary judgment in favor of Sweeney dismissing Dunlap's statute of limitations defense, and the case should be remanded for trial.

Respectfully submitted this 3rd day of February, 2015.

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CERTIFICATE OF SERVICE

The undersigned does hereby declare the same under oath and penalty of perjury of the laws of the State of Washington:

On February 3, 2015, I served the document to which this is annexed by email and First Class Mail, postage prepaid, as follows:

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and upon Appellants' co-counsel, Kyle Olive and William A. Gilbert, via email pursuant to prior agreement for electronic service, as follows:

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Signed on February 3, 2015 at Ephrata, Washington.

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