

## SUMMARY STATEMENT

*Alexander v. Stibal*, Docket No. 41604

In an appeal from a decision of the Bonneville County District Court, the Supreme Court affirmed in part, reversed in part, and ordered a reduction in the award of punitive damages. The case involved Vianna Stibal, who taught a self-discovered method of healing known as ThetaHealing. In 2011, one of Stibal's students, Kara Alexander, sued Stibal for fraud, breach of contract and unjust enrichment. Alexander's breach of contract and fraud claims were tried before a jury. The district court allowed Alexander to amend her complaint to assert a claim for punitive damages. During the course of trial, the district court denied Stibal's motion to dismiss Alexander's fraud and contract claims by way of a directed verdict. Ultimately, the jury awarded Alexander \$111,000 on the contract claim, \$17,000 on the fraud claim, and \$500,000 in punitive damages. Stibal moved for a new trial and for judgment notwithstanding the verdict (JNOV). The district court denied these post-trial motions, but did reduce the punitive damages award to \$384,000 pursuant to Idaho Code section 6-1604. Stibal appealed, challenging, among other things, the district court's decision denying her motions for reconsideration, JNOV, and a new trial. The Supreme Court reversed the district court's decision denying Stibal's motion for JNOV on the contract claim, affirmed the denial of Stibal's motion for JNOV on the fraud claim, and affirmed an award of punitive damages, but determined that the punitive damages award must be reduced to \$100,000.