

SUMMARY STATEMENT

English v. Taylor

The Idaho Supreme Court affirmed the Bonneville County district court's dismissal of Carol and Eric Englishes' (the Englishes) medical negligence claims against James Taylor, D.O., and Eastern Idaho Health Services, Inc., d/b/a Eastern Idaho Regional Medical Center (collectively, the Respondents). Carol English sustained stroke injuries when she underwent a medical procedure performed by Respondents. The Englishes subsequently filed suit in district court against parties who are not involved in this appeal, but later amended the complaint to include Respondents. The Respondents moved the court for summary judgment, arguing that the amended complaint naming the Respondents was filed after the statute of limitations had expired. The district court agreed that the amended complaint was untimely and granted Respondents' motions for summary judgment. The Englishes then appealed to the Idaho Supreme Court, arguing that a cause of action is deemed to commence as of the date of the filing of the motion to amend, not the date of the filing of the actual amended complaint.

The Idaho Supreme Court rejected the Englishes' argument and affirmed the district court. The Court held that when a party files an amended complaint that adds a new party to the action, it is the filing of the actual amended complaint that commences proceedings for statute of limitations purposes, not the filing of the motion to amend. The Court awarded attorney fees on appeal to Eastern Idaho Regional Medical Center and awarded costs to both Respondents.