

SUMMARY STATEMENT

Hollingsworth v. Thompson

Docket No. 47488

This appeal focuses on whether business filings made by a county hospital created the false impression the hospital was a private corporation, not subject to the notice requirements of the Idaho Tort Claims Act (“ITCA”). Rockne Lee Hollingsworth and Deborah Hollingsworth appeal from a summary judgment ruling by the district court that their medical malpractice claim against Walter Knox Community Hospital, Inc., d/b/a Valor Health, and one of its physicians is time-barred. The district court held that the Hollingsworths lacked due diligence in determining the hospital was a political subdivision to which the ITCA’s notice requirement applied. On appeal, the Hollingsworths argued they were misled by the hospital’s corporate filings, which showed it to be a nonprofit corporation, not subject to the ITCA. The hospital argued the corporate entity was the same as the county hospital and both were subject to the ITCA.

The Idaho Supreme Court concluded that the district court erred in holding the Hollingsworths did not exercise due diligence by relying on the corporate filings associated with Walter Knox Community Hospital, Inc., d/b/a Valor Health, to determine the named defendant was not a governmental entity subject to the ITCA. Additionally, the Idaho Supreme Court concluded the doctrine of quasi-estoppel applies, entitling the Hollingsworths to proceed on the merits of their claims. The Idaho Supreme Court reversed the district court’s summary judgment order and remanded the case for further proceedings.

This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.