

SUMMARY STATEMENT
Ridgeline Medical, LLC v. Lyon
Docket No. 52069-2024

This case presented a constitutional challenge to parts of the Idaho Patient Act (“IPA”). Ridgeline Medical, LLC, filed a collection action against David Lyon for medical services he received. Lyon counterclaimed that Ridgeline’s lawsuit violated section 48-304(3) (2020) of the IPA and sought an award of statutory penalties under section 48-311 (2020). Ridgeline moved for summary judgment and argued that Lyon had breached an implied in fact contract for medical services and that certain provisions of the IPA violated the United States Constitution. Specifically, Ridgeline asserted that certain provisions violated the First Amendment’s right to freedom of speech, right to petition, and a purported right to engage in pre-petitioning activity. Ridgeline also asserted that the challenged provisions violated the Fourteenth Amendment’s equal protection and Due Process clauses and that the IPA’s statutory penalty provision violated the Eighth Amendment. Lyon did not oppose Ridgeline’s constitutional arguments but did file a cross-motion for summary judgment arguing that he was entitled to statutory penalties and that Ridgeline’s complaint should be dismissed due to its failure to comply with the IPA.

The magistrate court initially concluded that the challenged sections were unconstitutional but severable from the remainder of the IPA. The Idaho Attorney General then filed a motion to intervene on behalf of the State of Idaho to defend the constitutionality of the IPA. The magistrate court granted the motion to intervene and received supplemental briefing and held a second hearing on the constitutional issues. During this time, Ridgeline abandoned its Eighth Amendment argument and instead argued that the IPA’s statutory penalty provision violated the Fourteenth Amendment’s Substantive Due Process Clause. The magistrate court later issued a written decision that vacated its earlier order and concluded that the challenged IPA provisions were constitutional. Ridgeline appealed the decision to the Idaho Supreme Court.

The Idaho Supreme Court affirmed the district court’s intermediate appellate decision. The Court held that the challenged IPA provisions did not infringe upon the right to free speech because the speech at issue was commercial speech and therefore intermediate scrutiny applied, and the regulations satisfied intermediate scrutiny. The Court held that the challenged provisions did not infringe on the right to petition because the IPA does not deprive Ridgeline of a cause of action. The Court held that, to the extent a right to engage in pre-petitioning activity exists, Ridgeline failed to establish that the IPA infringed on pre-petitioning activity. Finally, the Court held that the challenged provisions did not violate the Fourteenth Amendment because Ridgeline failed to establish that the IPA violated a fundamental right or involved a suspect classification or that the IPA’s statutory penalty provisions were so “obviously unreasonable” as to violate the Substantive Due Process Clause.

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