

SUMMARY STATEMENT

MRS v. Eddins, Docket No. 47848

This is a medical collection case. Medical Recovery Services, LLC (MRS) sued Michael Eddins to collect on debts that it had allegedly been assigned from Intermountain Emergency Physicians and Intermountain Anesthesia. After a bench trial the magistrate court dismissed MRS's complaint, holding it failed to prove that valid assignments occurred. MRS appealed and the district court reversed, holding the magistrate court erred in limiting the admission of two exhibits, Exhibit 2 and Exhibit 6, that purported to establish that the claims were validly assigned to MRS. Alternatively, the district court held Eddins was judicially estopped from raising the assignment issue at trial because he did not raise it earlier in the course of proceedings. Eddins timely appealed to this Court.

The Idaho Supreme Court first held that the district court improperly applied the doctrine of judicial estoppel because Eddins never changed positions in this case. In addition, the Court recognized that standing is jurisdictional and can be raised at any time. Next, the Court affirmed the district court's holding that the magistrate court abused its discretion in limiting the admission of Exhibit 2 because it was properly authenticated by testimony at trial, thus, it should have been admissible for all purposes. However, the Court reversed the district court's holding that the magistrate court abused its discretion in limiting the admission of Exhibit 6.

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