***Byrne v. Cleveland Clinic***, No. 12-4033 (3d Cir. Mar. 19, 2013)

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| Facts of the Case   * What happened? * Focus on legally significant facts (facts that mattered to the outcome of the case). * Refer to parties descriptively (i.e., buyer/seller, not plaintiff/defendant). | The case involved William F. Byrne (plaintiff), who claimed that the Cleveland Clinic and Chester Country Hospital (defendants) breached the Emergency Medical Treatment and Active Labor Act (“EMTALA”). The contract claimed to be breached under the law of Pennsylvania. The plaintiff asserted that the hospitals did not treat him on an emergency basis, and he had to wait for many hours before accessing medical care. |
| Procedural Facts  Explain the actions taken in the lower courts   * Who sued whom for what claim? * Who won at the trial court level? * Who appealed and why? * If Supreme Court opinion, who won at the appellate court level? Who appealed and why? | Mr. Byrne complained in court, IFP application filed, but the complaint was dismissed.  Mr. Byrne again filed an amended complaint after several weeks  The defendant challenged the amended complaint and request for its dismissal.  Plaintiff insisted on proceeding the claim according to the  marshal appropriate case law. |
| Issue  Should be in the form of a question. | Did Mr. Byrne file his complaint within the applicable statutes of limitations? |
| Holding  Should be a yes/no answer to the Issue, followed by Rule. | No, the complaint was not filed within the applicable statutes of limitations (Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) ) |
| Rationale  Explain the basic reasoning that the court used to reach its decision.  Outline point-by-point using bullets or numbered paragraphs. | * Entitlement as Matter of Law, Appropriateness * Emergency Care Negligence, Patient Ant- Dumping Act * The parties are not directly involved into a contract |
| Dicta  Dicta refers to statements by the court that are tangential or not relevant to the actual holding.  Note here any useful dicta. | * The plaintiff brought a stabilization claim under EMTALA that is not a federal malpractice statute; rather is a statute related to anti-discrimination. * Breach of the implied contract; not actual, verbal, or written one |
| Dissent/Concurring Opinions  Identify author of the opinion.  Identify why the author is dissenting – does the author disagree with the majority’s reasoning or with the result (or both)?  Outline reasoning point-by-point using bullets or numbered paragraphs. | N/A |