IN THE SUPREME COURT
STATE OF GEORGIA

CASE NO. S19C0499

DALE P. DALY, M.D. and
SAVANNAH CARDIOLOGY, P.C.,

Petitioners,

v.

SHANE H. BERRYHILL and **PAMELA S. BERRYHILL,**

Respondents.

AMICUS CURIAE BRIEF OF THE GEORGIA DEFENSE LAWYERS ASSOCIATION IN SUPPORT OF GRANTING THE PETITION FOR CERTIORARI

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DALE P. DALY M.D. and **SAVANNAH CARDIOLOGY, P.C.**, Petitioners, **v.** **SHANE H. BERRYHILL** and **PAMELA S. BERRYHILL**, Respondents.	**Case no. S19C0499**

AMICUS CURIAE BRIEF OF
THE GEORGIA DEFENSE LAWYERS ASSOCIATION

COMES NOW the Georgia Defense Lawyers Association ("GDLA") and files this Brief as *amicus curiae* in the above-styled appeal, showing this honorable Court as follows:

I. INTRODUCTION AND STATEMENT OF INTEREST

The GDLA is an association of more than 900 Georgia lawyers, including sole practitioners and members of law firms of all sizes, who engage in litigation, primarily for defendants in civil lawsuits. The GDLA is dedicated to, among other purposes, supporting and improving the civil defense bar, improving the adversary system of jurisprudence in our courts, eliminating court congestion and delay in litigation, and otherwise promoting improvements in the administration

of justice. The GDLA's members include numerous attorneys who represent medical doctors and other professionals.

The GDLA and its members hope to ensure that basic principles of Georgia tort law are clearly defined and uniformly applied. In addition, the GDLA, its members, and their clients have an interest in ensuring that jury verdicts are not disturbed due to erroneous interpretations of Georgia law. Although the case below involved allegations of professional negligence against a medical doctor, the issues raised by the Court of Appeals' opinion also implicate much more basic and universal principles of tort law. Specifically, in reversing the jury's verdict in this case, the Court of Appeals misinterpreted and misapplied Georgia law on the affirmative defense of assumption of the risk.

The jury instructions given by the trial judge in this case included a charge on the affirmative defense of assumption of the risk. The GDLA respectfully submits that there was at least "slight" evidence from which a reasonable jury could have found that the plaintiff assumed the risk of his injuries, which is all the law requires. Specifically, the jury charge was appropriate because the plaintiff's injury occurred when he ignored his cardiologist's instructions and undertaking the inherently dangerous, risky activity of hiking through rough terrain and climbing atop a deer stand some 18 feet above ground level just five days after undergoing heart surgery. Even if the plaintiff had no subjective understanding

that the medication prescribed by his cardiologist might cause dizziness or fainting, that would not render it inappropriate to instruct the jury on assumption of the risk. Certainly, a reasonable jury could find that the plaintiff understood and assumed the risks inherent in climbing onto a structure such as this just five days post-surgery:

(T-749.)

The jury could have determined simply that the plaintiff assumed the risk of falling from a height of 18 feet, which under well-established Georgia law is a risk inherently understood even by young children. The fact that the plaintiff's cardiologist also instructed the plaintiff and his wife on three separate occasions not to engage in strenuous or risky activity provides additional evidence of

assumption of the risk but would not be essential to such a finding under the facts of this case.

Indeed, the GDLA respectfully submits that a reasonable jury could find that when a person undergoes heart surgery and his cardiologist tells him not to engage in any "strenuous" or "risky" activity for at least a week, making the decision to go deer hunting and climbing onto an 18-foot-high deer stand is an assumption of the risk of serious injury. Any reasonable person certainly would understand that the risk of not listening to his cardiologist's instructions immediately following heart surgery could result in serious injury. At the very least, a reasonable factfinder could find that the plaintiff in this case understood that failing to follow his cardiologist's instructions might have grave consequences. The fact that the plaintiff fainted instead of experiencing some more serious heart-related problem or dying does not change anything. It is undisputed that had the plaintiff in this case not gone hunting and climbed high onto a deer stand five days after surgery, he would not have been injured. As a result, a jury question existed as to whether the plaintiff assumed the risk of failing to follow his cardiologist's instructions. The Court of Appeals erred in holding there could be no authorized finding of assumption of the risk in the case below, and this Court should grant *certiorari* to reinstate the jury's verdict.

II. ARGUMENT AND CITATION OF AUTHORITY

The relevant facts of the case below appear fairly straightforward. Shane Berryhill underwent a surgical procedure performed by cardiologist Dr. Dale P. Daly to address a blocked artery. After the procedure, Dr. Daly and a nurse told both Berryhill and his wife that Berryhill should not return to work for a week and should not engage in any strenuous or risky activity, including lifting, bending, or stooping over. Berryhill was also provided a discharge packet that included those and other instructions. Instead of following Dr. Daly's instructions, Berryhill elected to go deer hunting just five days after the surgery. While hunting, Berryhill carried a rifle across rough terrain and then climbed atop a deer stand approximately 18 feet above the ground. After climbing the deer stand, Berryhill allegedly fainted and fell, injuring himself.

Berryhill sued Dr. Daly and his practice, Savannah Cardiology, P.C., contending that Dr. Daly prescribed too much blood pressure medication and that caused Berryhill to faint. The case was tried to a jury, which ultimately returned a verdict in favor of Dr. Daly and his practice. Berryhill appealed, arguing among other things that the trial court erred in charging the jury on assumption of the risk. The Court of Appeals reversed the trial court's judgment, holding that the jury instruction on assumption of the risk was not appropriate. Dr. Daly and his practice have now petitioned this Court for *certiorari*.

A. The scope and applicability of the doctrine of assumption of the risk are matters of great concern, gravity, and importance to the public, and the Court of Appeals' opinion below creates confusion and unfairness.

The Supreme Court may review cases which present matters of "great concern, gravity, and importance to the public" and cases which create "confusion and unfairness."[1] The GDLA respectfully submits that the Court of Appeals' reversal of the jury's verdict in this case presents a matter of great concern, gravity, and importance to the public because it would substantially modify the defense of assumption of the risk under Georgia law.

This Court should grant *certiorari* in this case because the Court of Appeals' reversal of the jury verdict below represents a significant and concerning departure from well-established Georgia law on assumption of the risk. The Court of Appeals erred in reversing the jury's verdict in this case both because there was sufficient evidence from which the jury could have found that Berryhill subjectively appreciated the risk inherent in his activities at the time he was injured. Furthermore, the jury was authorized to find that the danger of hiking through rough terrain and climbing 18 feet up to hunt from a deer stand just five days after undergoing heart surgery was so obvious that he is charged with knowledge of the risks involved even if he claims not to have understood them.

[1] *See* Sharp v. Dept. of Transportation, 267 Ga. 267, 270 (1996); GA. S. CT. R. 40.

This Court should grant *certiorari* not simply to reinstate the jury's verdict but to reiterate that only "slight" evidence is required to warrant a jury charge on assumption of the risk. The Court should also grant *certiorari* to hold that when a patient fails to follow his doctor's orders, he assumes the risk of injuries naturally flowing from that decision. This case also provides the opportunity for this Court to clarify and reinforce the objective component of the test for determining whether a plaintiff assumed the risk of his injuries. Finally, the Court should grant *certiorari* to explain once again that where a plaintiff knowingly engages in conduct which he knows or should have known carried a risk of substantial injury, he cannot defeat an assumption of the risk defense by parsing out specific features or elements of risk the plaintiff claims not to have appreciated.

B. The trial court properly charged the jury on assumption of the risk, and the Court of Appeals erred in reversing the jury's verdict, because the jury reasonably could have found that Berryhill assumed the risk of his injuries by engaging in "strenuous" or "risky" activities five days after undergoing heart surgery against the instructions of his cardiologist.

1. Georgia law on assumption of the risk and the subjective/objective standard applied to plaintiffs.

Assumption of the risk is a long-standing principle of Georgia law first recognized by this Court as an absolute bar to a plaintiff's recovery well over a

century ago.[2] Under Georgia law, a plaintiff assumes the risk of his injuries where the plaintiff knew of a danger, understood and appreciated the risks associated with that danger, and voluntarily exposed himself to those risks.[3] Put differently, the defense "bars recovery when it is established that a plaintiff, without coercion of circumstances, chooses a course of action with full knowledge of its danger and while exercising free choice as to whether to engage in the act or not."[4] Where a person assumes the risk of his injuries or otherwise fails to exercise ordinary care, the assumption of risk serves as a complete bar to the his claims against the defendant even if there is evidence that the defendant was negligent.[5]

"Assumption of risk in its simplest and primary sense means that the plaintiff has given his express consent to relieve the defendant of an obligation of

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[2] *See*, *e.g.*, Griffith v. Lexington Term. R. Co., 124 Ga. 553 (1905).

[3] *See*, *e.g.*, Rayburn v. Ga. Power Co., 284 Ga. App. 131, 134 (2007); Liles v. Innerwork, Inc., 279 Ga. App. 352, 354 (2006).

[4] Rayburn, 284 Ga. App. at 134-35.

[5] *See*, *e.g.*, City of Winder v. Girone, 265 Ga. 723, 724 (2) (1995); Downes v. Oglethorpe Univ., Inc., 342 Ga. App. 250, 254 (2017); Rice v. Oaks Investors II, 292 Ga. App. 692, 693-94 (1) (2008); Riley, 210 Ga. App. at 868 (2). *See also* Landings Ass'n, Inc. v. Williams, 291 Ga. 397 (2012) (reversing trial court's order denying defendant premises owner's motion for summary judgment because decedent's decision to walk in a community in which she knew wild alligators were present "indisputably shows that [the decedent] either knowingly assumed the risks…or failed to exercise ordinary care").

conduct toward him and to take his chance of injury from a known risk."[6] "The result is that the defendant is simply under no legal duty to protect the plaintiff."[7]

Georgia law is clear that a trial court must give a jury instruction on assumption of the risk as long as there is at least "slight evidence" to support such a charge.[8] In order to prevail on a defense of assumption of the risk, the defendant must show that the plaintiff (i) had actual knowledge of the danger in question, (ii) understood and appreciated the risks associated with such danger, and (iii) voluntarily exposed himself to those risks.[9] Successful proof of assumption of the risk will bar the plaintiff's claims even where the defendant acted willfully and wantonly or was grossly negligent.[10]

Assumption of the risk differs from the affirmative defense of contributory negligence in that the court generally will apply a subjective standard in considering an assumption of the risk defense, looking to the particular plaintiff and his situation in order to determine whether "the plaintiff subjectively comprehended the specific hazard posed, and affirmatively or impliedly assumed

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[6] Hackel v. Bartell, 207 Ga. App. 563, 564 (1993); Lundy v. Stuhr, 185 Ga. App. 72, 75, citing Prosser, LAW OF TORTS at 303 (2nd ed.).

[7] Id.

[8] Teems v. Bates, 300 Ga. App. 70, 72 (2009).

[9] Liles v. Innerwork, Inc., 279 Ga. App. 352 (2006).

[10] Id.; Muldovan v. McEachern, 271 Ga. 805 (1999).

the risk of harm that could be inflicted therefrom."[11] **There are some cases, however, where the plaintiff's assumption of the risk is so "plain and palpable," and the relevant danger so obvious, that an objective standard applies:**

> Every adult is presumed to be endowed with normal faculties, both mental and physical. No person should conduct [himself] in an irresponsible manner when even ordinary prudence would protect [him] from the likelihood of possible injury. **At some point the danger and likelihood of injury becomes so obvious that actual knowledge by the plaintiff is unnecessary.**[12]

Georgia's appellate courts have applied this reasoning to hold that summary judgment was appropriate on the basis of the plaintiff's assumption of the risk of injury in several contexts, perhaps the most obvious of which involves the potential of falling from a significant height. For example, in Liles v. Innerwork, Inc., the Court of Appeals affirmed the trial court's grant of summary judgment to the defendant where the plaintiff "had actual knowledge of the danger associated with the activity and appreciated the risk involved, as any reasonable person would understand the danger inherent in allowing oneself to be dropped from a height of eight to ten feet."[13] Indeed, Georgia's appellate courts have held repeatedly that "**[n]o danger is more commonly realized or risk**

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[11] Muldovan, 271 Ga. at 808 (2); Garner v. Rite Aid of Ga., Inc., 265 Ga. App. 737, 739-40 (2004) (physical precedent only).

[12] Hackel, 207 Ga. App. at 564 (emphasis supplied); Lundy, 185 Ga. App. at 75.

[13] 279 Ga. App. at 354 (2).

appreciated, even by children, than that of falling; consciousness of the force of gravity results almost from animal instinct."[14] So obvious is this risk that under Georgia law, children as young as six years old are charged with knowledge, as a matter of law, that they may fall and injure themselves when they engage in an activity that involves the risk of falling.[15]

The objective standard applies to the doctrine of assumption of the risk in other contexts as well. For example, in White v. Georgia Power Co., the Court of Appeals held that "the danger of drowning in a body of water is an apparent, open danger, the knowledge of which is common to all," and affirmed the trial court's grant of summary judgment to the defendant in that case.[16] In Abee v. Stone Mountain Memorial Association, this Court held that the risk of flipping over and hitting one's mouth on a waterslide "was a danger which was patent and obvious to anyone familiar with the ride" and that the plaintiff had assumed the risk of his

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[14] Kane v. Landscape Structures, Inc., 309 Ga. App. 14, 18 (2011) (*en banc*) (internal brackets omitted), *quoting* Augusta Amusements, Inc. v. Powell, 93 Ga. App. 752, 757 (1956) (emphasis supplied).

[15] Id. ("Certainly a normal child nearly seven years of age—indeed any child old enough to be allowed at large—knows that if it steps or slips from a tree, a fence, or other elevated structure, it will fall to the ground and be hurt. It may be that some children, while realizing the danger, will disregard it out of a spirit of bravado, or because…of their 'immature recklessness,' but [a defendant] is not to be visited with responsibility for accidents due to this trait of children of the more venturesome type.").

[16] 265 Ga. App. 664, 666 (1) (2004).

injury by choosing to ride the waterslide.[17] And in Muldovan v. McEachern, this Court held that the decedent assumed the risk of death as a matter of law by loading a single bullet into a handgun, giving the gun to another person, and instructing him to point the gun at the decedent's head and pull the trigger.[18]

In Hackel v. Bartel, the Court of Appeals reversed the trial court's denial of summary judgment in favor of a defendant where the plaintiff was struck by a car after she reached into its open door, while it was parked on a slope, and released the emergency brake without checking to see whether the car was in gear.[19] And in Lundy v. Stuhr, a full Court of Appeals held that a part-time kennel attendant assumed the risk of being bitten when he entered the kennel of an Akita breed dog weighing over 100 pounds that he had been warned was an "escape artist" and "will bite," failed to exit the dog's kennel when it began to walk toward him, and, instead, suddenly stood and extended his arm to the dog as it approached him.[20]

In each of those cases, the plaintiffs sought to avoid a finding of assumption of the risk by contending they did not subjectively appreciate the risks attendant to their conduct. This Court and the Court of Appeals rejected those arguments,

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[17] 252 Ga. 465, 465-66 (1984).

[18] 271 Ga. 805, 810 (2) (1999).

[19] 207 Ga. App. 563, 563-64 (1) (1993).

[20] 185 Ga. App. 72, 72-74 (1987) (*en banc*).

however, instead imposing the objective standard that applies where the risks associated with a person's conduct are so obvious that the plaintiff is charged with knowledge of those risks.

2. This Court's reaffirmance of general principles of assumption of the risk in Landings Association, Inc. v. Williams in 2012.

In Landings Association, Inc. v. Williams,[21] this Court again reaffirmed that as a matter of Georgia law, where a particular hazard and its attendant risks are blatantly obvious, assumption of the risk can be established based on an objective standard of reasonableness. In Williams, the plaintiffs sued two entities that owned and managed a planned residential and golf community where the plaintiffs lived on Skidaway Island. The plaintiffs in that case sought to recover from the defendants for the death of one of the plaintiffs' 83-year-old mother, Gwyneth Williams, allegedly due to an alligator attack on the defendants' premises. The evidence in the case showed that alligators moved into and out of the community through a series of lagoons installed by the defendants while developing the property. Williams went for a walk one evening and her body was found the next morning floating in a lagoon with signs of having been bitten by an alligator. An eight-foot long alligator later was caught and killed, and parts of the decedent's body allegedly were extracted from its stomach.

[21] 291 Ga. 397 (2012).

The defendants in Williams moved for summary judgment, contending that the decedent assumed the risk by electing to go for a walk in the community with knowledge that there were alligators around. The plaintiffs argued essentially that since the decedent only knew only of the presence of smaller alligators and she did not know precisely where they were, she could not be deemed to have assumed the risk associated with larger alligators located in the area of the community where she had elected to go for a walk. The trial court denied the motion for summary judgment, and on appeal, the Court of Appeals affirmed. The defendants petitioned this court for *certiorari*, and this Court reversed, holding that summary judgment should have been entered for the defendants because the decedent "had equal knowledge of the threat of alligators within the community."[22]

This Court went on to hold in Williams that since the decedent knew that wild alligators were dangerous, by choosing "to go for a walk at night near a lagoon in a community in which she knew wild alligators were present . . . Williams either knowingly assumed the risks of walking in areas inhabited by wild alligators or failed to exercise ordinary care by doing so."[23] This Court's decision in Williams clearly demonstrated that a plaintiff cannot avoid the defense of

[22] Id. at 397.

[23] Id. at 399.

assumption of the risk simply by contending that he did not subjectively appreciate the obvious risks involved in an activity.

3. The Respondents incorrectly attempt to shift the inquiry away from respondent/plaintiff Berryhill's own knowledge and conduct.

Turning to this case, it should be noted at the outset that the primary argument made by the Respondents in opposing *certiorari* is fundamentally incorrect. Respondents contend that Berryhill could not be found to have assumed the risk of his injuries because he did not know of Dr. Daly's alleged negligence. In other words, Respondents contend that whether Berryhill knew of the risks inherent in the actual hazard or in his own actions is completely irrelevant and cannot form the basis for a finding of assumption of the risk. In support of this argument, Respondents quote generic case law but do not identify any specific instance where this Court rejected the defense of assumption of the risk because the plaintiff assumed the risk of his own conduct and an obvious hazard but lacked specific knowledge of the defendant's specific alleged negligence.

A cursory examination of case law regarding assumption of the risk exposes the incorrectness of the Respondents' argument. It is well established, for example, that a person can assume the risk of drowning in a lake without regard to the nature or extent of anyone else's alleged negligence. The risk assumed is drowning, and that risk exists by virtue of existence of the lake, with or without

any contributing negligence of by the defendant. The plaintiff assumes the risk posed by "the danger of drowning in a body of water," not necessarily the risk of any specific act or omission by the defendant on its own.[24] While often there will be a more precise confluence of the risk itself and the defendant's alleged negligence, that is not and need not always be so.

4. In the case below, a reasonable factfinder could have found that Berryhill assumed the risk of his injuries by exposing himself to known or obvious risk of injury.

In this case, in reversing the jury verdict below, the Court of Appeals erroneously focused on the specific mechanism of injury and ignored the more general and obvious risk of serious injury by engaging in activities Berryhill was advised by his cardiologist to avoid. It can hardly be argued that a person who has just undergone life-saving heart surgery does not apprehend the severity of his condition and the risks involved in not following doctor's orders immediately following the surgery. A jury would be authorized to charge Berryhill with the general knowledge that by disregarding Dr. Daly's instructions, Berryhill was assuming the risk of serious injury.

Whether Berryhill perceived the specific mechanism of injury (i.e., alleged fainting) is irrelevant to whether he can be found to have assumed the risk of his

[24] White v. Ga. Power Co., 265 Ga. App. 664, 666 (1) (2004).

injuries. The Petitioners were not required to show that Berryhill knew of the specific risk of fainting to authorize a jury charge on assumption of the risk in this case. The Court of Appeals' holding to the contrary is an incorrect application of Georgia law regarding assumption of the risk and is precisely the type of reasoning rejected by this Court in Williams.

In this case, there certainly was at least "slight evidence" from which the jury could have found that by way of his actions on the date in question, Berryhill assumed the risk of his injuries. The jury would have been authorized to find that Berryhill's act of climbing 18 feet into the air onto the deer stand, by itself, was an assumption of the risk of falling. In other words, the jury could have found that Berryhill assumed the risk of his injuries because he is charged with knowledge of the risk of falling without regard to whether he believed he might become dizzy or faint due to his medication.

In addition, or in the alternative, the jury could have found that Berryhill assumed the risk of his injuries by failing to heed his cardiologist's instructions. As outlined above, in establishing the defense of assumption of the risk, "[a]t some point the danger and likelihood of injury becomes so obvious that actual knowledge by the plaintiff is unnecessary."[25] In this case, a reasonable jury certainly could have found that hiking across rough terrain while carrying a rifle

[25] Hackel, 207 Ga. App. at 564 (emphasis supplied); Lundy, 185 Ga. App. at 75.

and then climbing up to a deer stand 18 feet above the ground five days after undergoing heart surgery was "strenuous" or "risky."

The risk of falling and injuring oneself by climbing atop a deer stand 18 feet in height five days after undergoing life-saving heart surgery—much like the risk of being attacked by an alligator when alligators are known to live in the vicinity, drowning in a body of water, or being killed by someone pointing a loaded gun at one's head and pulling the trigger—is plain, palpable, and obvious to anyone of normal intelligence. The jury certainly was authorized to find that Berryhill "either knowingly assumed the risks" of hiking through rough terrain and climbing 18 feet into a deer stand just five days after surgery "or failed to exercise ordinary care by doing so."[26]

If there is some question whether Berryhill knew or should be charged with knowledge that the specific activities were "strenuous" or "risky," that would be a question of fact to be resolved by the jury upon proper instruction from the judge on the law. That is what occurred at the trial below, and the Court of Appeals erred in substituting its own opinion for that of the jury in deciding whether Berryhill understood or should have understood the risks inherent in hiking through rough terrain and climbing 18 feet into the air just five days after undergoing heart surgery. If the Court of Appeals' decision is allowed to stand, it

[26] Williams, 291 Ga. at 399.

will create substantial confusion and uncertainty as to when the objective standard that controlled in such cases as Lundy v. Stuhr, Hackel v. Bartel, and Muldovan v. McEachern, and reaffirmed in Williams v. Landings Association, applies and when it does not.

III. CONCLUSION

The trial court correctly charged the jury on assumption of the risk, and the Court of Appeals erred in inserting its own judgment in the place of the ruling of the trial court and longstanding Georgia law. This Court should grant *certiorari* in this matter to reaffirm the applicability of the assumption of the risk defense in cases such as this.

Respectfully submitted this 14th day of January, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing **AMICUS CURIAE BRIEF OF THE GEORGIA DEFENSE LAWYERS ASSOCIATION** in the above-listed case on all parties by depositing a copy of same in the United States Mail with sufficient postage thereon to ensure delivery, addressed as follows:

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