IN THE SUPREME COURT OF MISSISSIPPI
NO. 2008-IA-01043-SCT

KENDALL T. BLAKE, M.D. AND
JACKSON BONE AND JOINT CLINIC, L.L.P. — APPELLANTS

VS.

ESTATE OF DAVID ALEXANDER CLEIN,
BY AND THROUGH ITS ADMINISTRATRIX,
DEBORAH CLEIN — APPELLEE

INTERLOCUTORY APPEAL BRIEF FOR APPELLEE, THE ESTATE OF DAVID ALEXANDER CLEIN

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CERTIFICATE OF INTERESTED PERSONS

The undersigned counsel of record for the Appellee, certifies that the following persons listed have an interest in the outcome of this claim. These representations are made in order that the Justices of the Supreme Court and/or the judges of the Court of Appeals may evaluate possible disqualification or recusal.

1. **Lance Stevens, Roderick D. Ward III** and the law firm of **Stevens & Ward, P.A.**, Jackson, Mississippi, attorneys for the Appellee;

2. **Stuart Robinson, Jr., Richard T. Conrad, Leo J. Carmody, Stan T. Ingram, Christopher Solop and Ronald D. Farris**, attorneys for the Appellants, and shareholder members of their firm;

3. **The Estate of David Alexander Clein and its administratrix, Deborah Clein,** , Mississippi, Appellee;

4. **Kendall T. Blake, M.D.,** Appellant; and

5. **Jackson Bone & Joint Clinic, L.L.P.**, including its other principals **"Mac" Robinson** and **Clyde X. Copeland, M.D.**, Appellants.

SO CERTIFIED on this the 18th day of November, 2009.

Lance Stevens
Attorney for the Appellee

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STATEMENT OF THE ISSUES

1. WHETHER THE TRIAL COURT ABUSED ITS DISCRETION BY ORDERING THAT THE APPELLEE BE ALLOWED TO PROCEED *IN FORMA PAUPERIS* AT THE TRIAL LEVEL AND, AS A PART THEREOF, THAT THE APPEAL COSTS TAXED BY THE MISSISSIPPI SUPREME COURT SHOULD BECOME PAYABLE AT THE CONCLUSION OF THE LITIGATION; AND WHETHER SUCH A RULING CURES ANY CONSTITUTIONAL DEFECT THAT WOULD BE ENCOUNTERED BY THE DEFENDANTS' PROPOSED APPLICATION OF MISS. CODE ANN. § 11-3-43 (1972).

2. WHETHER THE TRIAL COURT ABUSED ITS DISCRETION BY FAILING TO DISMISS THE CLAIM IN ITS ENTIRETY ON THE GROUNDS THE ADMINISTRATRIX ALLEGEDLY SUBMITTED MATERIALLY FALSE SWORN TESTIMONY THAT DOES NOT ADDRESS THE MERITS OF THE UNDERLYING MEDICAL MALPRACTICE CLAIM.

STATEMENT OF THE CASE

The original trial of this matter, resulting in a $3.5 million dollar jury verdict, is fully addressed in *Blake v. Clein,* 903 So.2d 710 (Miss. 2005). While no single reversible error was determined to exist, the Supreme Court reversed and remanded the *Clein* case on the weight of the cumulation of smaller, non-reversible errors. The Appellants' recitation of the procedural progress of this claim beyond that stage is largely correct. Some supplementation of those facts warrant mention.

The most compelling fact ignored in the current presentation is that, despite any dispute (real or feigned) regarding the exact amount of the estate's debts, there is no evidence of any sort to indicate that the estate is solvent. It is a pauper and no evidence to the contrary has ever been adduced in the record, nor could any. Blake has not, and will not, allege this estate is solvent.

Additionally, the Appellants' description of the Cleins' "failure" to submit the "required pauper's affidavit" after the Court's expressed time deadline omits, to some degree, two important facts. One, the Cleins had already submitted two pauper affidavits with the Court prior to the trial court's July 11, 2007 order. (R. 118-120; R. 79-81) Second, the "third" affidavit was filed one day after the Court's ten day deadline imposed in that order. It is beyond contest that this "delay" was caused by the Hinds County Circuit Clerk's failure to copy Plaintiff's counsel with that order.[1] The Plaintiff filed her extensive pauper's affidavit by hand-delivery, which had been prepared for some time and was simply awaiting the Court's order, the day after counsel learned of the order. The trial court reasonably and prudently allowed the final affidavit to be

[1]With all due respect to my friends and hard working colleagues at the Hinds County Circuit Clerk's office, the problems within that office associated with this claim are now legendary. The original appeal included a series of motions to correct the record at the trial court level and exhibits were unquestionably lost by the Clerk. Ths interlocutory appeal, as well, required record corrections.

filed (R. 575-576).[2]

The final pauper's affidavit, which defense counsel was allowed to question the administratrix about in a deposition promptly scheduled for that purpose, included, in an attempt to be as thorough as possible on potential assets and liabilities, what has come to be called "legal loans" in this profession.[3] While the Defendants take issue with whether these "loan" documents (provided to them by Plaintiff's counsel)[4] constitute a "loan" or merely an assignment or investment, the "loans" had some financial value that the Plaintiff believed might be worth the Defendants' investigation.[5] They were innocently disclosed as "loans" or "debts."

With regard to Clein's "misrepresentations" in her bankruptcy filing, the Appellants ignore the fact that Clein disclosed her contingent interest in the suit to her bankruptcy attorney, who then failed to list the asset for reasons stated in her affidavit (R. 574). Also, Clein amended her filing, the bankruptcy was dismissed and no creditor was prejudiced by her innocent error (R. 571).

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[2]The Defendants do not allege in the text of their legal analysis that this justifiable one day tardiness entitles them to any relief. They apparently just chose to mention it in the procedural recount of the claim. As such, it will not be addressed further by Clein.

[3]The "lenders" advertise their services under the auspices of getting an advance on the civil claim to be repaid upon successful resolution. The process causes angst to Plaintiffs' counsel which is beyond the scope of this presentation.

[4]The Appellants also attempt to obfuscate the issue by mentioning the comments of counsel applicable to the documents reviewed by the trial court *in camera*. Counsel's comments regarding the perceived conservatism of Judge Swan Yerger or the perceived trend in appellate medical malpractice claims, while attempting to give the "lawsuit loan" people some idea of the possibilities of the outcome, are hardly relevant to either the estate's pauperism or the underlying medical malpractice claim. It is also important for counsel to provide these lenders with the worst case scenario so that the client will be in a better bargaining position should settlement discussions with these loan sharks ensue.

[5]It is quite likely that had the estate failed to list these "loans," Defendants' arguments today would be that the estate had fraudulently covered up a source of "income" or an "asset" (the loan proceeds) and this matter should be dismissed just the same. It is "darned if you do, darned if you don't." This matter will be explored in greater length hereafter.

Finally, with regard to the allegations of false statements by the administratrix in her "pauperism deposition," specifically the alleged misstatement regarding her criminal record, the trial court noted the serious nature of those allegations. The trial court, at least by implication, foreshadowed the fact that the administratrix might be cross-examined on those "serious" credibility issues should she testify. However, consistent with existing precedent, the trial court refused to dismiss the claim of the estate based upon an apparent misrepresentation by the estate administrator of a fact immaterial to the underlying medical malpractice claim.

SUMMARY OF THE ARGUMENT

The Appellee, since the date this Court reversed and remanded the jury's verdict in its original opinion, has promptly and diligently worked to obtain a trial setting and bring this matter to a final and timely close. The Appellee filed a Motion to Set Trial on November 23, 2005,after the Court's mandate (R. 29-30).

The Appellee's claim, which has already proved quite meritorious in its original trial by jury, has been stalled by the Appellants' insistence that appeal costs be paid in advance of a new trial setting. The estate has established itself as a pauper worthy of the Court's ruling that all costs may be executed upon after the conclusion of the litigation, but not before.

Two different trial judges, Circuit Court Judge Bobby Delaughter and Circuit Court Judge William Coleman, have entered well-reasoned orders supporting the Appellee's position on these issues.

The Appellants are not entitled to dismissal of the claim based upon the alleged misstatements of the estate's administratrix. The statements, whether explainable or not, were immaterial to the facts in the underlying medical malpractice case. The penalty for those misstatements should be their use in cross-examining the administratrix at trial, should she

testify, not the dismissal of a claim affecting other beneficiaries of the estate (the deceased's children).

ARGUMENT

I. THE APPELLEE SHOULD BE ALLOWED TO PROCEED TO TRIAL; AND PROCEED AS A PAUPER; PROCEED WITH COSTS BEING PAID AT THE CONCLUSION OF THE MATTER

A. The Trial Court's Order Allowing the Appellee to Proceed with the Prosecution of this Matter Is A Reasonable Exercise of his Discretion

Despite the application of specific rules related to appellate costs, MISS. CODE ANNO. § 11-53-69 (1972) gives the trial court a reasonable basis to delay the payment of expenses until the conclusion of the matter.[6] The Court was well advised to do so in the present case, given the significance of the appeal costs involved, the pauperism of the Appellee and the diligence of counsel in attempting to set a trial within the two year period, making the prescriptive period moot.

1. The appeal bond cost was not required by the Appellee

The Appellee offered compelling evidence, in the form of e-mails and correspondence between counsel, proving that the Appellee did not require the appeal bond which resulted in the astronomical costs taxed in this matter ($153,398.01). (R. 76-115; R. 121-128). The trial court disagreed (R. 240-247).

2. The Appellee attempted to schedule trial before the two year period

The Appellee's attempt to schedule trial after this Court's mandate was met with a lack of cooperation. The Appellants' persistent, if understandable, insistence on attempting to "win" this claim through hyper-technical applications of rules with little or no precedent, rather than facing

[6]The argument that 11-53-69 controls the timing of the payment of appellate costs is specifically rejected in *Martin v. Reikes*, 587 So.2d 285 (Miss. 1991). This Appellee does not contend such a *per se* application.

a jury that had already awarded $3.5 million in damages in the first trial, precluded such attempts.

On November 23, 2005, the Appellee filed a Motion to Set Trial (R. 29-30) This motion was heard by the Court on June 9, 2006 (R. Vol. 6, [. 1-32)[7]. However, the Appellants' constant filing of motions thereafter, all of which alleged that the Appellee was not entitled to a trial setting, delayed this matter for years. The death of Mr. Clein, on November 25, 2006, admittedly was another source of delay, even with the prompt filing of the Suggestion of Death and Motion to Amend the Complaint to include the estate as a party (R. 248 and 321).

The fact of the matter, much to the angst of the local Bar, is that even the most vanilla circuit court lawsuit in the First Judicial District of Hinds County, Mississippi, may require more than two years to try. The backlog of criminal cases has compelled this Court to appoint two (2) additional circuit court judges to address the county's caseload. One only has to go to the judges' websites to see second and third settings of cases presently that would be considered ancient in other circuits.[8]

B. The Appellee should be allowed to proceed to trial *in forma pauperis*

The Appellants begin by asserting that Miss. Rule of Civ. Pro. 3(c) only applies to the "commencement of the action." While it is clear that Rule 3 is titled "Commencement of Action," there is no such limitation within the Rule. Rule 3(b), for instance, addresses the revision of costs deposits where a motion of the "clerk or any party to the action" requires some

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[7]At the conclusion of this hearing, the judge requested that the parties "get with the Court Administrator and see of you can agree to a tentative trial date." (R. Vol. 6, p. 31). The parties could not agree to a date.

[8]This counsel has a second setting on a 2005 contract claim set for November 30, 2009. The claim has been continued twice. According to counsel for the first setting, this four year old matter will be continued again. Judge Coleman made comment on a litigant's ability to even get a trial within two years at the final hearing of this matter (R. Vol. 7, p. 160-161).

additional security on the part of the plaintiff. Rule 3(d) addresses the accounting for costs "within sixty days of the conclusion of an action." And the subsection at issue, Rule 3(c) simply states that "the costs deposit and security for costs may be waived" in the event of pauperism.

Most certainly, there is nothing in the Rules that prohibits a motion to proceed as a pauper after the commencement of the action.

These Appellants citation of *Slaydon v. Hansford*, 830 So.2d 686 (C.A. Miss. 2002) and *Moreno v. State*, 637 So.2d 200 (Miss. 1994) is a bit misleading. While each does contain language which prohibits (or discourages) the practice of allowing a party to proceed as a pauper beyond the "initial" trial, both cases surround requests by parties to **appeal** those trial decisions as a pauper. The text specifically set out in the Appellants' brief from *Nelson v. Bank of Mississippi*, 498 So.2d 365 (Miss. 1986) is notorious for the fact that it is addressing the right to appeal *in forma pauperis*. *Bessent v. Clark*, 974 So.2d 928 (Miss. 2007), cited by these Appellants, is identical in that respect.

The same can almost be said of the holding in *Ivy v. Merchant*, 666 So.2d 445 (Miss. 1995), specifically disallowing an appeal based upon pauperism, the Court does hold that "[T]he right to appear *in forma pauperis* in a civil matter exists at the trial level only." *Id.* at 447. This mirrors the "trial level only" holding in *Life & Cas. Ins. Co. v. Walters*, 200 So. 732, 733-34 (Miss. 1941), also cited by the Appellants.

The point here is fairly obvious. This Appellee did not request any leave to appeal any decision of the trial court as a pauper. This Appellee requested, and the Court justly allowed, to proceed with his claim *at the trial court level* as a pauper. The procedural posture of all the decisions cited by these Appellants, as well as the literal language of those that are not

specifically addressing a request to appeal on that basis, make this ruling entirely proper.

The trial judge was insightful in his dismissal of the Defendants' argument. Judge Delaughter wrote:

> Thus, the Court of Appeals, in *Slaydon,* was eminently correct that the appellant was not entitled to appeal *in forma pauperis,* but, with all due respect, to state that the right is limited to the initial or first trial was neither necessary nor correct. The Mississippi Supreme Court has never limited rights enjoyed at the trial level to the initial trial .
>
> It has in fact, explicitly recognized the following general procedural principle:
>
> [W]here the case has been reversed and remanded for a new trial, a trial *de nova* follows. The trial court hears the case as if for the first time and considers all matters as though there had been no prior trial.[9]
>
> This includes additional pleadings and additional evidence.[10] The evidence may, in turn, include any change in the conditions on which the lawsuit was initially based.[11] In *Carroll v. Louisville & N.R. Co.*,[12] the plaintiff filed a pauper's affidavit in lieu of costs. The defendant claimed that the plaintiff had been paid $500.00 the previous year and, thus was not indigent. The trial court Agreed and dismissed the suit.[13] On appeal, however, the Mississippi Supreme Court reversed, holding that such evidence was insufficient for the trial court to make such a finding.
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> In the case *sub judice*, these defendants contend that the plaintiff should not be allowed to proceed in *forma pauperls* at this stage, contending that he bore the costs of extensive discovery and expert witnesses preceding and during the first trial.

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[9]*West v. State*, 519 So.2d 418, 425 (Miss. 1988); See also *Weems v. Amer. Sec. Ins. Co.* 486 So.2d 1222, 1226 (Miss. 1986); *Miller v. Watson*, 467 So.2d 672, 674 (Miss. 1985)

[10]*Sperry's Estate v. Sperry*, 196 So. 653, 656 (Miss. 1940)

[11]*Campbell v. Schmidt*, 195 So.2d 87, 90 (Miss. 1967)

[12]122 So. 469 (Miss. 1929)

[13]See what is today codified in MISS. CODE ANN. Section 11-53-19.

The lawsuit was filed August 29, 1997. Defendants argue, in effect, that if Mr. Clein was not indigent nine years ago, he cannot be so now. The argument is specious at best. If the Court is to base its ruling on speculation instead of evidence, it is just as likely that the very fact that Mr. Clein was called upon to pay the costs of experts and extensive discovery in a protracted medical malpractice case is the *ratson d'erre* of his current pauperism.

MISS. CODE ANN., Section 11-53-17 provides:

A citizen may commence any civil action, or answer a rule for security for costs in any court without being required to prepay fees to give security for costs, before *or after* commencing suit, by taking and subscribing the following affidavit: [content of affidavit omitted] [Emphasis added].

This lawsuit, being reversed and remanded for a new trial, commences anew. Plaintiff is free to file anything raising any additional issue that the law would have been permitted to be filed on August 29, 1997, including a pauper's affidavit in the form required by Section 11-53-17. The law recognizes that following a reversal and remand on appeal, there may be a change in the conditions on which a suit was initially commenced. In this Court's opinion, that may include the financial condition of the plaintiff. Section 11-53-17 further recognizes that an indigent plaintiff may continue is suit, as well as commence it, on an affidavit of poverty. Mr. Clein should not summarily preclude from attempting to establish that because his poverty he is not able to pay the costs to continue his civil action. If Clein is truly impoverished, to require that he pay the costs requested by the defendants before allowing him to continue his action, would run afoul of Section 11-53-17 (R. 244-245).

Judge Coleman, replacing Judge Delaughter after his suspension, agreed with Delaughter's decision in the final hearing of this matter.

The Appellee was not required to pre-pay these substantial costs to proceed at the trial level. Miss. Code Anno. §§ 11-3-41 and 11-3-43 have been misapplied by the Appellants.

C. The Defendants proposed Application of Statute is Unconstitutional

The Mississippi Constitution guarantees that the state court system will be open to all litigants and that the "right to justice" and ability to get into a Mississippi courtroom shall be kept open to all those with issues before a tribunal.

Mississippi Constitution article 3, section 24, (1890) is broad in its scope and requires:

> All courts shall be open; and every person for an injury done him in his lands, goods, person, or reputation, shall have remedy by due course of law, and right to justice shall be administered without sale, denial or delay.

Immediately following this is the mandate of Mississippi Constitution in article 3, section 25.

> No person shall be debarred from prosecuting or defending any civil cause for or against him or herself, before any tribunal in the state, by him or herself, or counsel, or both. Any person... is guaranteed the right to represent himself or herself in any court in any civil cause.

The trial court also analyzes this issue with great insight when it wrote:

> As we shall now see, to do so would also trample upon certain constitutional rights secured to Mr. Clein.
>
> In *United States v. Kras*[14] the United States Supreme Court held that Kras was not entitled to be discharged in bankruptcy until he paid the required filing fees, notwithstanding his claim of poverty, because "[t]here is no constitutional right to obtain a discharge of one's debts in bankruptcy." Moreover, resort to the court was held not to be his sole path to relief.
>
> As a matter of state constitutional law, Mr. Clein and "every person for an injury done him...shall have remedy by the course of law, and right and justice shall be administered without sale, denial or delay."[15] Mr. Kras did not have a constitutional right to file for bankruptcy, but Mr. Clein has the constitutional right to commence and continue his civil action, seeking " a remedy by the due course of law" for injury allegedly done him. Requiring Mr. Clein, if impoverished, to pay the requested costs before allowing him to proceed in seeking that remedy would effectively deny him access to the only court empowered to afford it.
>
> All litigants have the right to equal treatment, the proposition that there may be no invidious discrimination amongst identifiable classes of persons. The

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[14]409 U.S. 434 (1973)

[15]MISS. CONST. (1890), Art. 3, Section 24

right to commence and continue civil actions, seeking remedy for injury done by due course of law, being granted to "every person," no class, i.e., poor persons, may be denied that right.[16] Thus, the Court declines to preclude the plaintiff herein, David Alexander Clein, from proceeding in *forma pauperis* if he satisfactorily establishes that which the statute requires.

II. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION BY FAILING TO DISMISS THE CLAIM IN ITS ENTIRETY ON THE GROUNDS THE ADMINISTRATRIX ALLEGEDLY SUBMITTED MATERIALLY FALSE SWORN TESTIMONY

A. No *Pierce* dismissal is warranted

Consistent with the strategy to win this claim for reasons completely separate from the merits, the Appellants have also offered the errant conclusion that the trial court abused its discretion by refusing to dismiss the claim in its entirety on the grounds that the administratrix made misrepresentations under oath during her "pauper deposition," even though the alleged misrepresentations had nothing to do with the underlying medical malpractice claim.

The Appellants cite the familiar cases of *Pierce v. Heritage Properties, Inc*, 688 So.2d 1385 (Miss. 1997) and *Scoggins v. Ellzey Beverages, Inc*, 743 So.2d 990 (Miss. 1999) to support the proposition that any misrepresentation under oath by a party requires "the death penalty"–the most penal sanction known to law, the dismissal of the claim.

But these authorities can be addressed succinctly. In both *Pierce* and *Scoggins,* a plaintiff made material representations about the underlying claim. In *Pierce*, the Plaintiff (without any possible excuse for her oversight and with motives that become quite obvious) lied about the existence of a material eyewitness to the injury.[17] In *Scoggins*, the Plaintiff lied about being

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[16]*Griffin v. Illinois,* 351 U.S. 12 (1956)

[17]The witness was lying in bed with her when she was injured.

treated for a similar injury–treatments that occurred so regularly and on so many occasions that any court would be forced to conclude that her testimony was perjury and went to the core of her underlying personal injury claim.

In the present claim, Mrs. Clein's alleged misstates are completely free and apart from the liability and damage issues of the medical malpractice claim.

B. Debt was not overstated

The administratrix called her deceased husband's "legal loan" a "loan," instead of an "investment." Her counsel also provided Appellants' counsel with a copy of every one of the financial instruments. There was nothing nefarious here. Obviously, if the administratrix had failed to provide this information, these Appellants would now accuse her of understating the decedent's income.

The Appellants' citation to Miss. Code Anno. § 11-53-19 (1972), declaring that a court may dismiss an action "if satisfied the allegation of poverty was untrue," is clearly misplaced. The Appellant offers no evidence, no analysis, not a scintilla of credible thought to support the contention that the estate did not meet the pauper criteria. In fact, the Appellants do not even make the contention that such is true. Without contest, the estate was worthless, with a house condemned by FEMA after Hurricane Katrina (with a big mortgage), a couple of beat up cars (one with a note on it) and a host of other debts that could not be satisfied, this estate had a worth of zero (R. 533-536).

C. The bankruptcy filing is meaningless

The bankruptcy filing is irrelevant. Mrs. Clein, according to her own bankruptcy lawyer, informed her bankruptcy counsel of the contingent asset following the estate. Here is what her

bankruptcy lawyer testified to:

> Mrs. Clein disclosed to me that her husband had passed and he had a medical malpractice claim. We discussed that issue and we determined at that time it was not a part of the bankruptcy estate and did not need to be listed on the bankruptcy petition. To my knowledge, there was no dishonest or nefarious reason for the omission whatsoever.
>
> During early August, as best I remember, I received a phone call from attorney Lance Stevens addressing the failure to disclose the potential asset on the bankruptcy petition. This is the first tine I have ever spoken to Mr. Stevens on this or any other matter. I informed him that Mrs. Clein had discussed the lawsuit and based on the information which I had, there was no need to list it on the bankruptcy petition. However, based on the conversation with Mr. Stevens, more information was obtained concerning the nature of the claim, and I concluded that it should be listed. I was preparing to amend the schedules to list the claim, however, the case was dismissed on August 16, 2007, rendering the issue moot as to the bankruptcy case. (R. 574)

The bankruptcy was completely dismissed, with no creditor suffering any prejudice (R. 571), making both the "legal authority" cited by the Defendants and their analysis completely off base.

This allegation is a red herring.

There is no credible evidence –NONE– to indicate this estate is not a pauper, as defined by statute.

CONCLUSION

The Plaintiff's estate should be allowed to proceed to trial with appeal costs becoming payable at the conclusion of the matter. The misstatements under oath, if any, of the estate's administratrix during her "pauper deposition" do not warrant dismissal of the claim.

CERTIFICATE OF SERVICE

I, Lance L. Stevens, attorney for Appellee, hereby certify that I have this day forwarded by U. S. Mail, postage prepaid, a true and correct copy of the foregoing Interlocutory Appeal Brief for Appellee, the Estate of David Alexander Clein to:

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RESPECTFULLY SUBMITTED and SO CERTIFIED, this the 18th day of November, 2009.

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