

# Bond Case Briefs

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## **HOSPITALS - WASHINGTON**

### **Skagit County Public Hosp. Dist. No. 304 v. Skagit County Public Hosp. Dist. No. 1**

**Supreme Court of Washington, En Banc - July 11, 2013 - P.3d - 2013 WL 3483764**

Rural public hospital district brought action against another public hospital district operating clinic within plaintiff district's boundaries seeking declaratory judgment, a writ of prohibition, and injunctive relief.

The Supreme Court of Washington held that defendant hospital district acted in excess of its jurisdiction by providing medical services in plaintiff public hospital district's territory without that district's permission.

When the legislature empowers a municipal corporation to engage in a business, the corporation may exercise its business powers much in the same way as a private entity. Whether a municipal act is governmental or proprietary in nature depends largely on whether the act is for the common good or for the specific benefit or profit of the corporate entity.

Because the legislature has indicated that rural public hospital districts operate in a governmental capacity when providing health care services, the general rule that two municipal corporations may not perform the same function in the same territory applies.