

Bond Case Briefs

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GOVERNMENT CLAIMS ACT - WYOMING

Stroth v. North Lincoln County Hosp. Dist.

Supreme Court of Wyoming - June 23, 2014 - P.3d - 2014 WY 81

Personal representative of deceased patient's estate brought wrongful death action against county hospital district, town, and ambulance service after patient died from complications following his treatment at hospital. The District Court dismissed based on representative's failure to comply with Wyoming Governmental Claims Act (WGCA). Representative appealed.

The Supreme Court of Wyoming held that:

- Submission of notice of medical malpractice claim to Medical Review Panel did not toll time period representative had to file notice of claim under WGCA;
- Time period for submitting notice of claim under WGCA was not extended by continuous treatment doctrine; and
- Time period for filing notice of claim under WGCA was not extended due to deceased patient's incapacity.