

All Cardiac Injury Workers' Compensation Claims do not Require Proof of Legal and Medical Causation

Associated Grocers of the South, Inc. v. Goodwin, (2050574) 4/6/07

The employee in this case worked as a truck driver. He was working in the line and scope of his duties when his truck overturned. He sustained injuries, UAB hospital diagnosed him as suffering from multiple bilateral rib fractures, a right-sided pneumothorax, and a right pulmonary contusion. He was discharged 5 days later. Less than two weeks after his discharge, he was re-admitted into the hospital at UAB, and diagnosed as having "acute congestive heart failure decompensation secondary to trauma." He died later that same day.

His dependant filed for death benefits against the employer. At the time of the employee's death, he was 55 years old, 6 feet tall, and weighed 320 lbs. He had a history of smoking four packs of cigarettes a day; he had high blood pressure, asthma, coronary artery disease, and type 2 diabetes.

An autopsy was performed to determine the cause of his death. One doctor determined that the trauma from his truck accident was a contributing factor to his death, and the doctor retained by the employer determined that the accident did *not* contribute in any way to his death. The trial Court awarded death benefits to the dependant.

On Appeal, the employer argued that the deceased employee's preexisting medical conditions were the cause of his death, *rather than his on-the-job* accident. The employer argued that the case should have been analyzed as a "nonaccidental" injury. The Court disagreed and pointed out that it is the nature of the cause, not the nature of the injury that is determinative of the correct analysis to be applied. The court explained that not all cardiac injuries are automatically "nonaccidental." If a sudden, external event causes the injury, the claimant must only prove that the accident occurred, and that it medically caused the injury.

The Court finally considered whether the dependant had presented enough evidence of medical causation. The Court noted that "[i]f the employee suffers from a latent preexisting condition that inevitably will produce injury or death, but the employment acts on the preexisting condition to hasten the appearance of symptoms or accelerate its injurious consequences, the employment will be considered the medical cause of the resulting injury." *Taylor v. Mobile Pulley Mach. Works, Inc.*, 714 So.2d 300 (Ala. Civ. App. 1997). In affirming the trial court's decision, the Court held that the dependant presented substantial evidence supporting ". . . the trial court's finding that the motor-vehicle accident precipitated the sudden cardiac death of the employee. Because Alabama law does not require any greater proof of medical causation . . ."