

Case Brief

Crim law, Homicide, Involuntary Manslaughter

Hughes, 2/21/15

Identity of Case

State v. Williams, 484 P.2d 1167 (Wash. Ct. App. 1971)

Page 390 of the casebook

Summary of Facts/Procedural History

Williams are native americans with a less than high school education. Their baby developed a toothache, which they did not seek treatment for because they believed the gov't would take away their baby if they took it to the hospital (probably true). Toothache grew worse until it died. Convicted of involuntary manslaughter via negligence.

Appealed based on (1) existence of duty to furnish medical care and (2) proximate cause, i.e. whether defendants were put on notice in time to save the baby's life.

Statement of the Issue

see above.

Holding

Yes there is a duty to provide medical care to your children.

Proximate cause: if defendants were put on notice in time to save their baby, as the court finds they were, there is proximate cause.

Reasoning

This is a timing issue. If a reasonable person would've realized it was more than a toothache in time to save the baby, then failure to provide care is the proximate result. If they provided care but it was too late, or were reasonably put on notice too late, no proximate cause.

The court thinks they were put on notice early enough to save the baby, so there is proximate cause.

Negligence as involuntary manslaughter: failing to perform a duty which a reasonable person would do.

Evaluation