



## California Medical Expense Damage Law Flash

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### Court Limits Evidence of Medical Expenses in Personal Injury Actions

In ***Corenbaum v. Lampkin***, the California Court of Appeal, Second Appellate District, Division Three today interpreted *Howell v. Hamilton Meats* (2011) 52 Cal. 4<sup>th</sup> 541 concluding, amongst other things, that "evidence of the full amount billed [for past medical services] is . . . inadmissible for the purpose of proving noneconomic damages." Absent further appellate review, it appears that evidence of the full amount billed by a medical provider for past medical services cannot be considered by the jury in a personal injury trial, at least within the Second Appellate District.

[Click here to view the opinion.](#)

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