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Case Brief #1
October 4, 2022

Nguyen v. Massachusetts Institute of Technology, 479 N.E.3d 436 (SJC 2018)

The Supreme Judicial Court of Massachusetts affirmed the Middlesex County Superior Court ruling for summary judgment in favor of Massachusetts Institute of Technology (MIT), finding no responsibility for the suicide of the plaintiff's son. This wrongful death case was initially brought forth in the Superior Court Department on September 6, 2011. The Supreme Judicial Court granted an application for direct appellate review. The plaintiff alleged the university, two professors, and a dean to have been negligent in not preventing the suicide of his son, Han Duy Nguyen.

The issue discussed in this case was whether the institution could be held responsible for the suicide of a graduate student. In particular, the court first had to determine what kinds of duties and responsibilities, if any, does the institution have to its students' health and safety; then, the court had to decide if those responsibilities and duties had been breached.

The court examined several key pieces of evidence on the background of the student and his interactions with faculty and staff at MIT. First, the court explored a timeline of resources and support that were offered to the student by the institution—noting at each step of the process the student's negative reaction to such assistance. This was then compared to resources the student had been utilizing off campus, including seeking additional mental health support from professionals who did not consider him a threat to his personal health and safety. The court also noted that the student denied his mental health state, and often referred to his difficulties on campus as insomnia, despite having two previous suicide attempts.

Several key previous court findings were referenced. In regards to finding a party negligent in the case of suicide, two cases were presented to support the notion that there is no duty created for one party to prevent another's suicide ([Cremins v. Clancy](#), 415 N.E.2d 289 (SJC 1993), [Jupin v. Kask](#), 447 N.E.2d 141 (SJC 2006)). Furthermore, the court also described the difference between a custodial relationship, like that of jails and hospitals, and the relationships between a student and a university. In acknowledging that undergraduate students at universities are young adults, and graduate students are adults in all aspects of law, the court also acknowledges that students' health records are strictly protected—referencing [Family Educational Right and Privacy Act of 1974, 20 U.S.C. § 1232g](#) and the [Health Insurance Portability and Accountability Act of 1996, 42 U.S.C. § 1320d-6](#).

As a result of these considerations, the court concluded that in specific circumstances, a university does have a duty to take reasonable measures to prevent the suicide of a student; however, this case contained none of the defined circumstances for the following reasons: (1) this student did not disclose previous attempts that occurred at the institution, and the previous attempts were not recently before matriculation at MIT, (2) this student vehemently denied having suicidal ideation and/or being suicidal, and never stated plans or intentions to commit suicide, and further indicated he wished to keep his mental health issues separate from his academic issues, (3) this student was seeking professional help from psychiatrists and psychologists outside the MIT Mental Health system, and (4) this student was a twenty five year old adult who was not living on campus under daily observation.

Furthermore, the court also noted that duty for nonclinicians is even further limited, typically reduced to contacting appropriate authorities and/or initiating suicide prevention protocol, if applicable; the three named defendants in this case, Professors Birger Wernerfelt and

Drazen Prelec and assistant dean David W. Randall, fall under this category. On May 7, 2018, the court declared that there was no duty broken by the institution or the faculty, and affirmed that summary judgment was properly granted by the Superior Court.