

Kleinknecht Vs. Gettysburg College Case Brief

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Summary

During an off-season lacrosse practice at Gettysburg College, Drew Kleinknecht, a 20-year-old intercollegiate athlete, suffered a sudden cardiac arrest and later died. Contrary to the original account of the case, students and coaches were present during the practice. However, neither of the college's certified athletic trainers nor any student athletic trainer was initially present at the practice field. The coaches supervising the session were not certified in cardiopulmonary resuscitation, did not have a radio or telephone at the field, and had not established a clear procedure for responding to a medical emergency.

Kleinknecht's parents brought wrongful death and survival claims against Gettysburg College. They alleged that the college had negligently failed to provide adequate preventive measures, emergency planning, trained personnel, and prompt medical assistance during a school-sponsored athletic activity. The federal district court granted summary judgment in favor of Gettysburg College. It reasoned, among other things, that Kleinknecht had been a young and apparently healthy athlete and that his fatal cardiac arrest was not reasonably foreseeable.

The United States Court of Appeals for the Third Circuit reversed that judgment in *Kleinknecht v. Gettysburg College* (1993). The appellate court concluded that Pennsylvania law would recognize a special relationship between the college and a student whom it had recruited to participate in intercollegiate athletics. That relationship imposed a duty on the college to take reasonable precautions and provide prompt and adequate emergency medical assistance during a school-sponsored practice. The court did not rule that Gettysburg College was ultimately negligent. Instead, it held that the questions of breach and causation had to be decided by a jury or other factfinder.

Case Citation and Court

Kleinknecht v. Gettysburg College, 989 F.2d 1360 (3d Cir. 1993), was decided by the United States Court of Appeals for the Third Circuit on April 27, 1993. The case came before the federal courts under diversity jurisdiction, requiring them to apply Pennsylvania substantive law.

Because the Supreme Court of Pennsylvania had not directly ruled on the precise duty a college owed to a recruited intercollegiate athlete under these circumstances, the Third Circuit had to predict how Pennsylvania's highest court would decide the question. The appellate decision reversed the

judgment of the United States District Court for the Middle District of Pennsylvania and returned the case for further proceedings.

Facts of the Case

Drew Kleinknecht was a sophomore at Gettysburg College and a member of its Division III men's lacrosse team. He had been actively recruited to attend the college and play lacrosse. This fact became important because the Third Circuit distinguished a recruited intercollegiate athlete participating in an organized college program from an ordinary student independently using recreational facilities.

On September 16, 1988, Kleinknecht attended an off-season practice arranged for members of the lacrosse team. The practice was supervised by coaches employed by Gettysburg College. Lacrosse is a contact sport in which players may experience collisions, concussions, unconsciousness, and other serious injuries. Nevertheless, no certified athletic trainer or student athletic trainer had been assigned to remain at the field during this particular practice.

During a six-on-six drill, Kleinknecht suddenly collapsed. His collapse did not immediately follow bodily contact with another player. Teammates and coaches went to assist him, but there was initial uncertainty about the nature of his condition. Some individuals were concerned that he might have sustained a spinal injury and therefore hesitated to move him.

Obtaining trained assistance was difficult. Neither coach had a radio or similar communication device. The nearest available telephone was approximately 200 to 250 yards away inside the athletic training facility. Reaching it by the shortest route required crossing an eight-foot fence. A team member ran for assistance and climbed over the fence. A student athletic trainer eventually arrived at the field, followed by one of the college's certified athletic trainers.

Kleinknecht initially appeared to be breathing, but his condition rapidly deteriorated. Cardiopulmonary resuscitation was subsequently performed, and emergency medical services transported him to a hospital. Despite these efforts, he could not be revived and was pronounced dead later that day.

Before the incident, Kleinknecht had appeared to be in good health. Gettysburg College had not previously experienced a comparable cardiac arrest involving one of its student-athletes. These circumstances influenced the district court's conclusion that the college could not reasonably have anticipated the specific medical event. The Third Circuit, however, concluded that foreseeability should not be defined so narrowly.

Procedural History

Kleinknecht's parents filed wrongful death and survival claims against Gettysburg College. They

alleged that the college had been negligent in its supervision of the practice and in its preparation for foreseeable medical emergencies associated with intercollegiate athletics.

The district court granted summary judgment for Gettysburg College. Summary judgment is appropriate only when no genuine dispute of material fact exists and the moving party is entitled to judgment as a matter of law. The district court concluded that the college had no duty to anticipate a fatal cardiac arrhythmia in an apparently healthy young athlete. It also determined that the emergency assistance provided after Kleinknecht collapsed was reasonable under the circumstances.

The parents appealed. The Third Circuit reversed the district court's decision, concluding that a reasonable jury could find that Gettysburg College had failed to satisfy a legally recognized duty of care. The case was remanded for further proceedings rather than resolved conclusively in favor of either party.

Legal Issues

The principal issue was whether Gettysburg College owed a legal duty to establish and implement reasonable emergency procedures for a student-athlete participating in a college-supervised intercollegiate athletic practice.

A related issue was whether Kleinknecht's exact medical condition had to be foreseeable before the college could owe such a duty. The court also considered whether the evidence could support findings that the college breached its duty and that the alleged failures contributed to Kleinknecht's death.

Finally, the court examined whether Pennsylvania's Good Samaritan law protected Gettysburg College from liability for the emergency treatment administered by its employees.

Holding

The Third Circuit held that Gettysburg College had a special relationship with Kleinknecht because the college had recruited him to participate in intercollegiate lacrosse and he suffered cardiac arrest while taking part in a scheduled, school-sponsored practice supervised by college employees.

This special relationship imposed a duty on the college to take reasonable precautions for the safety of its recruited student-athletes. The duty included adopting reasonable measures to provide prompt and adequate emergency medical services during supervised intercollegiate athletic activities.

The court further held that Kleinknecht's precise cardiac arrest did not have to be foreseeable. It was enough that serious and potentially life-threatening injuries were reasonably foreseeable during participation in a contact sport. Whether Gettysburg College breached that duty and whether any breach caused or contributed to the death were factual questions that could not properly be resolved

through summary judgment.

The Special Relationship Between the College and the Athlete

As a general rule, a person or institution may not have an affirmative duty to protect another individual from every possible harm. However, such a duty may arise when the parties have a special relationship or when one party has assumed responsibility for the other's safety.

The Third Circuit found several circumstances supporting the existence of a special relationship. Gettysburg College had actively recruited Kleinknecht to play lacrosse. The college organized and sponsored the athletic program, scheduled the practice, employed the supervising coaches, and exercised control over the conditions under which the team practiced. Kleinknecht was therefore not merely a private student voluntarily engaging in an unsupervised recreational activity.

The court reasoned that when a college recruits a student to participate in an intercollegiate sport and directs that student to attend supervised practices, it assumes a corresponding responsibility to take reasonable precautions for the athlete's safety. The institution benefits from the athlete's participation and controls many aspects of the activity, including the facilities, coaching, scheduling, and availability of medical personnel.

The decision did not make a college an insurer of every athlete's health. Gettysburg College was not required to guarantee that no injury or medical emergency would occur. Its legal obligation was to act reasonably in light of the risks associated with the activity.

Foreseeability of Serious Athletic Injuries

The district court focused on whether Gettysburg College should have predicted that a young athlete with no known heart condition would suffer a fatal cardiac arrest. The Third Circuit found this approach too narrow.

Negligence law generally does not require a defendant to anticipate the precise sequence of events that ultimately produces an injury. The relevant question is whether the general type or class of harm was reasonably foreseeable. In this case, the appropriate inquiry was not limited to whether college officials should have predicted Kleinknecht's particular cardiac arrhythmia.

Lacrosse was recognized as a contact sport capable of producing serious injuries, including unconsciousness. College officials knew that athletic participants could require immediate medical treatment. Gettysburg College employed certified athletic trainers and student trainers, which itself demonstrated institutional awareness that sports-related medical emergencies could arise.

The Third Circuit concluded that a life-threatening emergency during a supervised lacrosse practice fell within the general category of harm that the college could reasonably anticipate. The unusual nature of Kleinknecht's exact condition did not eliminate the duty to prepare for serious emergencies.

Possible Breach of the Duty of Care

The appellate court did not decide that Gettysburg College had breached its duty. Instead, it identified evidence from which a reasonable jury might reach that conclusion.

At the time of the practice, no athletic trainer was stationed at the field. Neither supervising coach was certified in CPR. The coaches did not have a radio or immediate telephone access, and the nearest telephone was located a significant distance away. The shortest route to the training facility involved climbing a high fence. The coaches had also not discussed or rehearsed a coordinated emergency response procedure.

A jury could consider whether a reasonable college athletic program should have provided more immediate access to trained medical personnel, communication equipment, CPR-qualified supervisors, or a written emergency action plan. It could also examine whether the institution should have ensured that emergency responders could reach the practice field without delay.

These facts did not automatically establish negligence. The college could argue that its arrangements were reasonable by the standards existing at that time and that staff members responded appropriately once they recognized the seriousness of the emergency. The important procedural point is that these competing interpretations involved factual disputes that should not have been resolved through summary judgment.

Causation

Even if a duty and breach were established, the plaintiffs still had to prove causation. They needed to demonstrate that one or more failures by Gettysburg College were a factual and legally significant cause of Kleinknecht's death.

The causation question involved the timing of medical intervention and whether more immediate CPR, defibrillation, communication, or professional assistance would probably have changed the outcome. Such matters generally require medical testimony and careful evaluation of the sequence of events.

The Third Circuit did not conclude that a faster response would certainly have saved Kleinknecht. It held only that the available evidence created a factual issue that could not be dismissed as a matter of law. A jury would need to evaluate the expert evidence and determine whether any unreasonable delay or inadequate preparation contributed to the fatal outcome.

This distinction is essential to an accurate understanding of the case. The appellate ruling established the existence and scope of a legal duty, but it did not issue a final judgment that the college's conduct caused Kleinknecht's death.

Good Samaritan Immunity

Gettysburg College also argued that Pennsylvania's Good Samaritan law protected it from liability for the emergency assistance provided by its athletic training personnel. Good Samaritan laws are generally intended to encourage qualified individuals to provide emergency assistance without fear of liability for ordinary negligence.

The Third Circuit rejected the college's claim to statutory immunity. The applicable Pennsylvania provision linked immunity to individuals who held designated forms of certification or training. A corporate institution such as Gettysburg College could not itself possess the required personal certification.

The court also explained that an employer could remain potentially liable under principles of vicarious liability even if an individual employee qualified for personal statutory protection. The college could not automatically convert the possible immunity of a trained responder into institutional immunity from all claims concerning its own planning, staffing, supervision, or emergency arrangements.

The Good Samaritan issue therefore did not prevent the plaintiffs from pursuing their negligence claims against the college.

The Dissenting Opinion

Judge Samuel Alito dissented from the majority's disposition. Although he did not necessarily reject every aspect of the duty analysis, he believed that the plaintiffs had not produced sufficient evidence to show that the college's emergency arrangements or response constituted a breach of reasonable care.

The dissent reflects an important concern in negligence cases involving unexpected medical emergencies. Institutions should not be held liable merely because a tragic outcome occurred. Liability requires proof that the defendant acted unreasonably and that the unreasonable conduct caused the harm.

The majority agreed with this general principle but concluded that the evidence presented enough factual uncertainty to require further proceedings. Thus, the disagreement was substantially about whether the record permitted a reasonable finding of breach rather than whether colleges should guarantee the survival of every participant.

Significance of the Decision

Kleinknecht v. Gettysburg College became an important sports-law decision because it recognized that colleges may owe affirmative safety obligations to recruited athletes participating in institutionally controlled activities. The case demonstrates that the responsibilities of an athletic program extend beyond providing coaches, facilities, and equipment. Reasonable preparation for medical emergencies may also form part of the institution's duty.

The ruling is narrow. It does not establish that a trainer must stand beside every athlete during every practice, nor does it make a college strictly liable whenever an athlete is injured. The required precautions depend on the circumstances, including the sport, the probability and seriousness of potential injuries, the number and qualifications of available staff members, communication systems, access for emergency responders, and accepted professional practices.

The case nevertheless illustrates why organized athletic programs need emergency action plans. An effective plan should identify who will assess an injured athlete, who will contact emergency services, how responders will enter the facility, where emergency equipment is located, and who has responsibility for crowd control and communication. Coaches, athletic trainers, administrators, and medical personnel must understand their respective roles before an emergency occurs.

Modern athletic training guidance similarly emphasizes venue-specific emergency action plans, accessible communication systems, trained responders, appropriate emergency equipment, coordination with local emergency medical services, and regular rehearsal of procedures (Andersen et al., 2002; Scarneo-Miller et al., 2024). These practices do not eliminate every risk, but they reduce avoidable delays when immediate treatment is critical.

Conclusion

Kleinknecht v. Gettysburg College addressed whether a college could owe an affirmative duty to protect a recruited intercollegiate athlete during a supervised athletic practice. Drew Kleinknecht suffered a fatal cardiac arrest while participating in an off-season lacrosse session. Although coaches and teammates were present, no athletic trainer was initially stationed at the field, the coaches lacked immediate communication equipment, and no clearly coordinated emergency procedure had been established.

The district court granted summary judgment to Gettysburg College because Kleinknecht's specific cardiac emergency appeared highly unusual and unforeseeable. The Third Circuit reversed. It held that the college's relationship with a recruited athlete created a duty to take reasonable precautions and arrange prompt and adequate emergency assistance during school-sponsored athletic activities. The court evaluated foreseeability at the level of serious athletic injuries generally rather than requiring prediction of the exact cardiac event.

The decision did not conclusively hold Gettysburg College negligent. Breach and causation remained questions for the factfinder. The case's enduring importance lies in its recognition that colleges controlling intercollegiate athletic activities must reasonably plan for emergencies, even when the exact injury that ultimately occurs is rare or unexpected.

References

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