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Medical Staffing Company Owed No Duty Of Fair Procedure Before Removing Physician

California Employment Law on **September 22, 2026**

Stallion Springs Med. Services v. Superior Court, 2026 WL 2593327 (Cal. Ct. App. 2026)

An emergency-room physician (Kuljit S. Hundal) worked at a hospital under an independent-contractor agreement with Stallion Springs, a medical staffing company. After a patient complained about Hundal's conduct, the hospital directed Stallion Springs to remove him from the emergency-department schedule. Stallion Springs complied after conducting its own investigation and terminated Hundal's agreement for cause. Hundal sued, alleging that the company violated his common law right to fair procedure by removing him without notice and a hearing. The trial court denied Stallion Springs's motion for summary adjudication of the common law right of fair procedure claim. The Court of Appeal granted Stallion Springs's petition for writ of mandate and held that the common law right of fair procedure does not apply to a staffing company as a matter of law and directed the trial court to enter summary judgment in its favor. Stallion Springs was neither a statutory peer-review body nor a quasi-public organization with sufficient control over the physician's ability to practice medicine. It merely arranged staffing at one hospital, could not grant or restore medical-staff privileges, and did not prevent the physician from practicing elsewhere.

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