

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Estate of Hunter Bergner v. San Mateo County Sheriff's Office

Estate of Bergner · No. 24-cv-08596-CRB · Decided June 18, 2025

SUMMARY

The United States District Court for the Northern District of California grants defendants’ motions to dismiss claims arising from the suicide of Hunter Bergner while incarcerated at Maguire Correctional Facility. The court dismisses the Doe defendants’ claims without prejudice for failure to allege specific facts showing personal involvement, and rejects the municipal liability, supervisory liability, negligence, medical malpractice, Government Code section 845.6, Bane Act, and declaratory relief claims on various grounds. Plaintiffs are granted leave to amend within 28 days, except as to the medical malpractice claims against the County, Sheriff’s Office, Sheriff, and supervisor Does, which are dismissed with prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Charles R. Breyer
JURISDICTION	United States District Court for the Northern District of California
DECIDED	June 18, 2025
DOCKET	24-cv-08596-CRB
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs sued under 42 U.S.C. § 1983 and California law following Hunter Bergner's death by suicide while incarcerated. Defendants moved to dismiss the amended complaint under Federal Rule of Civil Procedure 12(b)(6), and the court granted the motions.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 12(b)(6), the court accepts factual allegations as true but need not accept legal conclusions couched as factual allegations; the complaint must allege enough facts to state a facially plausible claim for relief.
PRECEDENTIAL VALUE	Unknown; federal district court order

PARTIES

Estate of Hunter Bergner, Patricia Colet, L.B.1, L.B.2, S.B. v. San Mateo County, San Mateo County Sheriff's Office, Christina Corpus, Does 1–20

TOPICS

section 1983 prisoners rights motions to dismiss municipal liability negligence

PRACTICE AREAS

civil rights civil procedure constitutional law torts municipal law remedies

QUESTIONS PRESENTED

1. Whether the Doe defendants should be dismissed because the amended complaint failed to allege specific facts showing each Doe defendant's personal involvement.
2. Whether the County and Sheriff's Office were subject to municipal liability under Monell based on an alleged custom or practice or ratification.
3. Whether Sheriff Christina Corpus could be held liable under § 1983 on a supervisory-liability theory.
4. Whether plaintiffs adequately pleaded negligence-based wrongful death, including duty and proximate causation.
5. Whether the County, Sheriff's Office, and Sheriff could be held directly liable for medical malpractice when plaintiffs did not allege that they were medical providers.
6. Whether plaintiffs stated a claim under California Government Code § 845.6 by alleging knowledge of an incarcerated person's need for immediate medical care.
7. Whether plaintiffs stated a claim under the California Bane Act by alleging deliberate indifference without specific-intent facts.
8. Whether plaintiffs stated a claim for declaratory relief when that claim was premised on failed § 1983 claims.

HOLDINGS

1. Doe defendants may not remain in the action based only on conclusory group allegations; plaintiffs must allege a specific factual basis showing each Doe defendant's personal involvement in the alleged constitutional deprivation.
2. A municipality or local government unit is not liable under § 1983 on a custom-or-practice theory absent facts showing a sufficiently longstanding, frequent, and consistent practice that caused the constitutional injury and was maintained with deliberate indifference.
3. A supervisor cannot be held liable under § 1983 based on conclusory allegations; plaintiffs must allege facts showing that the supervisor set in motion acts that the supervisor knew or reasonably should have known would cause a constitutional injury.

4. A negligence-based wrongful-death claim requires facts establishing both a defendant's duty and proximate causation; allegations that jail staff knew only of hopelessness or despair, without facts showing knowledge of suicidal ideation or a known suicide risk, did not satisfy those requirements.
5. The County, Sheriff's Office, and Sheriff could not be held directly liable for medical malpractice where plaintiffs did not allege that those defendants were medical providers; the claims were futile and were dismissed with prejudice.
6. A claim under California Government Code § 845.6 requires facts showing that a public employee knew or had reason to know that the prisoner needed immediate medical care and failed to take reasonable action to summon it; allegations of generalized hopelessness and despair were insufficient.
7. A Bane Act claim cannot be sustained by merely repeating allegations of deliberate indifference; it requires facts establishing the specific intent required by the statute.
8. A declaratory-relief claim premised on failed § 1983 claims also fails to state a claim.

KEY QUOTATIONS

“where the identity of the alleged defendant is not known prior to the filing of a complaint, the plaintiff should be given an opportunity through discovery to identify the unknown defendants, unless it is clear that discovery would not uncover the identities, or that the complaint would be dismissed on other grounds.” (at 3)

“If Plaintiffs want to sue defendants whose names are yet unknown, they must identify a specific factual basis for doing so.” (at 5)

“Municipal liability cannot “be predicated on isolated or sporadic incidents; it must be founded upon practices of sufficient duration, frequency and consistency that the conduct has become a traditional method of carrying out policy.”” (at 6)

FACTUAL BACKGROUND

Hunter Bergner was incarcerated at Maguire Correctional Facility in March 2024 after a firearms conviction. He was described as despondent and hopeless, expressed concerns about his mental health to his girlfriend, and jail employees conducted cursory security checks before his cellmate found him hanging from a light fixture. Plaintiffs alleged that unidentified jail, medical, supervisory, and policymaking personnel failed to protect Bergner, provide medical care, supervise subordinates, and maintain adequate suicide-prevention practices.

PROCEDURAL HISTORY

Plaintiffs filed suit in their individual capacities and on behalf of Bergner's estate. After plaintiffs filed an amended complaint asserting ten causes of action, defendants moved to dismiss all claims and the Doe defendants. The court dismissed all claims, granting leave to amend most claims within 28 days, but dismissing the medical-malpractice claims against the County, Sheriff's Office, Sheriff, and supervisor Does with prejudice.

DISPOSITION

dismissed

CASES CITED

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Turner v. County of Los Angeles, 18 F. App'x 592, 596 (9th Cir. 2001)
- Wakefield v. Thompson, 177 F.3d 1160, 1163 (9th Cir. 1999)
- Est. of Urias v. Imperial County, No. 24-cv-1050-MMA, 2024 WL 4683295, at *2, *4 (S.D. Cal. Nov. 5, 2024)
- Jones v. Williams, 297 F.3d 930, 934 (9th Cir. 2002)
- Monell v. Department of Social Services, 436 U.S. 658, 690-91 (1978)
- Mackie v. County of Santa Cruz, 444 F. Supp. 3d 1094, 1113 (N.D. Cal. 2020)
- Trevino v. Gates, 99 F.3d 911, 918 (9th Cir. 1996)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1076 (9th Cir. 2016)
- City of Canton v. Harris, 489 U.S. 378, 392 (1989)
- Gillette v. Delmore, 979 F.2d 1342, 1346-47 (9th Cir. 1992)
- Redman v. County of San Diego, 942 F.2d 1435, 1447 (9th Cir. 1991)
- Dubner v. City & County of San Francisco, 266 F.3d 959, 968 (9th Cir. 2001)
- Quiroz v. Seventh Ave. Ctr., 140 Cal. App. 4th 1256, 1264 (2006)
- Campbell v. Herrera, No. 24-3296, 2025 WL 1525331, at *3 (9th Cir. May 29, 2025)
- Corales v. Bennett, 567 F.3d 554, 572 (9th Cir. 2009)
- Nelson v. State, 139 Cal. App. 3d 72, 78 (1982)
- Rodriguez v. County of Los Angeles, 891 F.3d 776, 802 (9th Cir. 2018)