

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Eric X. Murillo v. West County Detention Facility Medical

Case No. 25-cv-09541-RFL · No. 25-cv-09541-RFL · Decided December 16, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed Eric Murillo’s 42 U.S.C. § 1983 complaint against West County Detention Facility Medical with leave to amend. The court held that the complaint did not adequately allege a policy, practice, or custom sufficient to support municipal liability under Monell. The court ordered any amended complaint to be filed by January 23, 2026, and warned that failure to comply could result in dismissal under Federal Rule of Civil Procedure 41(b).

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Rita F. Lin
JURISDICTION	United States District Court for the Northern District of California
DECIDED	December 16, 2025
DOCKET	25-cv-09541-RFL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se detainee's 42 U.S.C. § 1983 complaint was screened under 28 U.S.C. § 1915A and dismissed with leave to amend.
STANDARD OF REVIEW	Preliminary screening under 28 U.S.C. § 1915A; the court accepts adequately pleaded factual allegations as true, liberally construes pro se pleadings, and dismisses claims that are frivolous, malicious, fail to state a claim, or seek relief from an immune defendant.
PRECEDENTIAL VALUE	Unpublished district court order; not precedential
PARTIES	Eric X. Murillo v. West County Detention Facility Medical

TOPICS

- municipal liability
- section 1983
- prisoners rights
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the complaint stated a cognizable claim under 42 U.S.C. § 1983 when it alleged inadequate medical care but did not identify a municipal policy, practice, or custom that caused the constitutional violation.
2. Whether the complaint should be dismissed under 28 U.S.C. § 1915A for failure to state a claim and whether leave to amend should be granted.

HOLDINGS

1. A plaintiff cannot state a Monell claim against a county or county agency merely by alleging inadequate medical care; the plaintiff must identify the constitutional right violated, identify and describe the municipality's policy, practice, or custom, and explain how that policy, practice, or custom was the moving force behind the injury.
2. A complaint subject to § 1915A screening must allege sufficient factual matter to state a plausible claim for relief, and a complaint that fails to state a claim must be dismissed.

KEY QUOTATIONS

“To establish that the county jail should be held liable under Monell, Plaintiff must identify the rights violated by that agency’s policy or practice, provide details on that policy or practice, and explain how the policy or practice specifically caused his injuries.” (Discussion § C)

FACTUAL BACKGROUND

Murillo, a detainee at Martinez Detention Facility, alleged that he informed jail medical personnel about a shoulder injury and pain caused in part by the thin mattress provided to him. He claimed that resulting sleep deprivation caused headaches and migraines and interfered with eating, exercising, and other simple tasks. He alleged that he repeatedly sought assistance but received no adequate response, and he attempted to sue the county jail under Monell.

PROCEDURAL HISTORY

Murillo, proceeding in forma pauperis and pro se, filed a civil-rights complaint concerning allegedly inadequate medical care and sought to impose liability on the county jail under Monell. The district court conducted preliminary screening under 28 U.S.C. § 1915A, found that the complaint did not allege a municipal policy, practice, or custom causing the alleged constitutional violation, and dismissed the complaint with leave to amend by January 23, 2026.

DISPOSITION

dismissed

CASES CITED

- *Balistreri v. Pacifica Police Department*, 901 F.2d 696, 699 (9th Cir. 1988)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 556, 570 (2007)
- *Clegg v. Cult Awareness Network*, 18 F.3d 752, 754-55 (9th Cir. 1994)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Monell v. Department of Social Services*, 436 U.S. 658 (1978)
- *Oviatt By and Through Waugh v. Pearce*, 954 F.2d 1470, 1474 (9th Cir. 1992)
- *City of Canton v. Harris*, 489 U.S. 378, 389 (1989)
- *Gordon v. Orange County*, 6 F.4th 961, 974 (9th Cir. 2021)
- *City of Oklahoma City v. Tuttle*, 471 U.S. 808, 823-24 (1985)
- *Ferdik v. Bonzelet*, 963 F.2d 1258, 1262 (9th Cir. 1992)

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