

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Stefon Morant v. City of New Haven et al.

Morant · No. 3:22-CV-630 (SVN) · Decided May 24, 2026

SUMMARY

The United States District Court for the District of Connecticut resolves disputes concerning proposed jury instructions in Stefon Morant’s Section 1983 action against the City of New Haven and individual defendants. The Court approves instructions requiring proof of but-for and proximate causation, addresses the deliberate-indifference standard for Monell liability, declines to instruct the jury on Connecticut General Statutes § 7-465, and determines that nominal damages instructions are inappropriate.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Sarala V. Nagala
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	May 24, 2026
DOCKET	3:22-CV-630 (SVN)
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving disputes concerning final jury instructions in a civil-rights action under 42 U.S.C. § 1983.
STANDARD OF REVIEW	The court reviewed the parties' proposed jury instructions for accuracy, legal sufficiency, potential prejudice, and consistency with governing law.
PRECEDENTIAL VALUE	Nonprecedential district-court order
PARTIES	Stefon Morant v. City of New Haven et al.

TOPICS

- jury instructions
- instructions objections
- section 1983
- municipal liability
- damages

PRACTICE AREAS

- civil rights
- constitutional law
- civil procedure
- jury instructions
- damages
- municipal law

QUESTIONS PRESENTED

1. Whether the jury should be instructed that but-for and proximate causation are required for Morant's § 1983 claims, including his Brady and Monell claims.
2. Whether the jury should receive Morant's proposed deliberate-indifference Monell instruction concerning whether a municipal policymaker knew or should have known that an omission was substantially certain to result in a constitutional violation.
3. Whether the jury should be instructed on Connecticut General Statutes § 7-465 and determine whether individual defendants' conduct was willful or wanton.
4. Whether the verdict form should include nominal damages or separate compensatory-damages lines for each defendant.

HOLDINGS

1. The court approved an instruction requiring Morant to prove both but-for causation and proximate causation for each § 1983 claim, including the Monell claim, while declining to decide whether Second Circuit law independently requires that standard because all parties agreed to the instruction.
2. The court approved an instruction requiring Morant to show that, based on facts available to Chief Pastore, the policymaker knew or should have known that the particular omission was substantially certain to result in a constitutional violation, while retaining the requirement of more than mere negligence and a conscious choice not to act.
3. The court declined to instruct the jury on § 7-465 or require jury findings under that statute. With the exception of Sweeney's objection, the parties consented to the court deciding whether the individual defendants' conduct was willful or wanton if liability was found; the court overruled Sweeney's objection in light of the existing partial summary judgment against him.
4. The court declined to include an instruction or verdict-form question on nominal damages and required a single compensatory-damages line rather than separate lines for each defendant.

KEY QUOTATIONS

“The Court will instruct the jury that Plaintiff must prove but for and proximate causation for each of Plaintiff’s Section 1983 claims, including his Monell claim, with the language from Bostock.” (Section I)

“Kerman makes clear that, “where the plaintiff was indisputably deprived of his liberty,” if the “conduct of the defendant responsible for the deprivation” is found to be unlawful, the plaintiff is “entitled to compensatory, not merely nominal, damages.”” (Section IV)

FACTUAL BACKGROUND

Morant brought § 1983 claims, including a Brady-related fair-trial claim, claims implicating municipal liability under Monell, and claims for damages. The case involved multiple defendants alleged to have committed different constitutional violations, and Morant sought compensatory and punitive damages. Because Sweeney was already subject to partial summary judgment, only causation and damages remained for the jury as to him.

PROCEDURAL HISTORY

The court held an initial charge conference on May 21, 2026, solicited supplemental briefing, and held a supplemental charge conference on May 22, 2026. The court had previously awarded Morant partial summary judgment against defendant Michael Sweeney, leaving causation and damages for the jury as to Sweeney. This order memorialized the court's rulings on the remaining disputed instructions before trial.

DISPOSITION

other

CASES CITED

- Drumgold v. Callahan, 707 F.3d 28, 49-50 (1st Cir. 2013)
- Poventud v. City of New York, 750 F.3d 121, 158-59 (2d Cir. 2014) (Jacobs, J., dissenting)
- Comcast Corp. v. Nat'l Ass'n of Afr. Am.-Owned Media, 589 U.S. 327, 331-32 (2020)
- Bostock v. Clayton County, 590 U.S. 644, 656 (2020)
- Zahrey v. Coffey, 221 F.3d 342, 349-51 nn.7-8 (2d Cir. 2000)
- Naumovski v. Norris, 934 F.3d 200, 213 (2d Cir. 2019)
- Arnold v. Geary, 582 F. App'x 42, 43 (2d Cir. 2014)
- Shaw v. Stroud, 13 F.3d 791, 799 (4th Cir. 1994)
- Powers v. Hamilton County Public Defender Commission, 501 F.3d 592, 608-09 (6th Cir. 2007)
- Whitlock v. Brueggemann, 682 F.3d 567, 582 (7th Cir. 2012)
- Harper v. City of Los Angeles, 533 F.3d 1010, 1026 (9th Cir. 2008)
- Furber v. Taylor, 685 F. App'x 674, 678 (10th Cir. 2017)
- Jackson v. Sauls, 206 F.3d 1156, 1168 n.16 (11th Cir. 2000)
- Smith v. District of Columbia, 413 F.3d 86, 102 (D.C. Cir. 2005)
- Garnett v. Undercover Officer C0039, 838 F.3d 265, 277 (2d Cir. 2016)
- City of Canton, Ohio v. Harris, 489 U.S. 378, 396 (1989)
- Connick v. Thompson, 563 U.S. 51, 61-62 (2011)
- Chislett v. New York City Department of Education, 157 F.4th 172, 191 (2d Cir. 2025)
- Jones v. Town of East Haven, 691 F.3d 72, 81-82 (2d Cir. 2012)
- Birch v. City of New Milford, 3:20-CV-1790 (VAB), ECF No. 267 at 23
- Nunez v. Diedrick, No. 14-CV-4182 (RJS), 2017 WL 4350572, at *2 (S.D.N.Y. June 12, 2017)
- City of Hartford v. Edwards, 946 F.3d 631, 633-35 (2d Cir. 2020)
- Kerman v. City of New York, 374 F.3d 93, 124 (2d Cir. 2004)
- Rodick v. City of Schenectady, 1 F.3d 1341, 1348 (2d Cir. 1993)

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