

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

T.O. v. O'Brien

No. 2:24-cv-03243-DJC-CKD (E.D. Cal. Mar. 7, 2025) · No. 2:24-cv-03243-DJC-CKD · Decided March 10, 2025

SUMMARY

The United States District Court for the Eastern District of California considered Defendant Michael O’Brien’s Rule 12(b)(6) motion to dismiss claims arising from Amy Wayne Morris’s arrest and subsequent death from acute ethanol withdrawal while in jail. The court concluded that Plaintiffs had not sufficiently pleaded causation for their state-created-danger, denial-of-medical-care, and familial-association claims, and that the arrest was supported by probable cause. The court dismissed all claims with leave to amend.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Daniel J. Calabretta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 10, 2025
DOCKET	2:24-cv-03243-DJC-CKD
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss four constitutional claims brought under 42 U.S.C. § 1983. The court granted the motion and dismissed the complaint with leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts factual allegations as true and construes them in the light most favorable to the nonmoving party, but dismissal is proper when the complaint lacks a cognizable legal theory or sufficient facts to plausibly establish entitlement to relief.
PRECEDENTIAL VALUE	unpublished district court order; persuasive at most

TOPICS

- motions to dismiss
- section 1983
- civil rights
- due process
- civil procedure

PRACTICE AREAS

civil rights

constitutional law

civil procedure

health law

QUESTIONS PRESENTED

1. Whether Plaintiffs plausibly alleged that O'Brien's alleged instructions to withhold medical information caused Morris's death, as required for a Fourteenth Amendment state-created-danger claim under § 1983.
2. Whether Plaintiffs plausibly alleged that O'Brien violated Morris's Fourth Amendment right to reasonable post-arrest medical care.
3. Whether Plaintiffs plausibly alleged that O'Brien arrested Morris without probable cause in violation of the Fourth Amendment.
4. Whether Plaintiffs plausibly alleged a causal connection between O'Brien's conduct and the children's Fourteenth Amendment claim for interference with familial relations.

HOLDINGS

1. The complaint did not plausibly allege cause-in-fact or proximate causation between O'Brien's alleged advice to withhold medical information and Morris's death, because the complaint showed that jail personnel knew of her heavy alcohol use and active withdrawal but failed to provide adequate monitoring and care.
2. The complaint failed to plausibly state a Fourth Amendment denial-of-medical-care claim because it did not show that Morris was in medical distress during or immediately after arrest, and it failed to connect O'Brien's conduct to the inadequate care she later received in jail.
3. The false-arrest claim failed because the facts established probable cause for Morris's arrest: she admitted biting her fiancé, and he provided evidence of an injury.
4. The familial-relations claim failed because Plaintiffs did not plausibly allege that O'Brien's conduct caused Morris's death and the resulting deprivation of the children's relationship with her.

KEY QUOTATIONS

“Based on these allegations, the Court finds that Plaintiffs have neither pled cause-in-fact nor proximate cause as Plaintiffs have not plausibly alleged Morris would have received better or different medical care had she disclosed the allegedly missing information in her medical file.” (Discussion § I)

“Defendant’s Motion to Dismiss (ECF No. 5) is GRANTED. Plaintiffs’ Complaint (ECF No. 1) is DISMISSED with leave to amend.” (Conclusion)

FACTUAL BACKGROUND

Truckee police officers arrested Amy Wayne Morris after her fiancé reported that she had bitten him during a dispute, although Morris claimed she acted in self-defense. Plaintiffs alleged that Officer Michael O'Brien instructed Morris not to disclose her medical conditions and medications to jail personnel, after which she was detained and died from acute ethanol withdrawal. The complaint also alleged that jail personnel knew Morris was a daily heavy alcohol user and in active withdrawal but failed to monitor and treat her adequately.

PROCEDURAL HISTORY

Plaintiffs filed the action on November 20, 2024, alleging state-created danger, denial of post-arrest medical care, false detention and arrest, and interference with familial relations arising from Amy Wayne Morris's arrest and subsequent death in jail. Defendant moved to dismiss on December 23, 2024. After a March 6, 2025 hearing, the court granted the motion and gave Plaintiffs thirty days to amend.

DISPOSITION

dismissed

CASES CITED

- *Mendiondo v. Centinela Hospital Medical Center*, 521 F.3d 1097, 1104 (9th Cir. 2008)
- *Steinle v. City & County of San Francisco*, 919 F.3d 1154, 1160 (9th Cir. 2019)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007)
- *Wood v. Ostrander*, 879 F.2d 583, 589-90 (9th Cir. 1989)
- *Ketchum v. County of Alameda*, 811 F.2d 1243, 1247 (9th Cir. 1987)
- *Martinez v. City of Clovis*, 943 F.3d 1260, 1271 (9th Cir. 2019)
- *Cornel v. Hawaii*, 37 F.4th 527, 531 (9th Cir. 2022)
- *Harper v. City of Los Angeles*, 533 F.3d 1010, 1026 (9th Cir. 2008)
- *White v. Roper*, 901 F.2d 1501, 1505-06 (9th Cir. 1990)
- *Estate of Macias v. Lopez*, 42 F. Supp. 2d 957, 964 (N.D. Cal. 1999)
- *Leer v. Murphy*, 844 F.2d 628, 633 (9th Cir. 1988)
- *Johnson v. Duffy*, 588 F.2d 740, 743 (9th Cir. 1978)
- *United States CFTC v. Monex Credit Co.*, 931 F.3d 966, 972 (9th Cir. 2019)
- *Park v. Kitt*, No. 1:19-cv-01551-AWI-HBK (PC), 2021 WL 1210364, at *5 (E.D. Cal. Mar. 31, 2021)
- *Chanda v. Federal Home Loans Corp.*, 215 Cal. App. 4th 746, 755 (2013)
- *Tatum v. City & County of San Francisco*, 441 F.3d 1090, 1098-99 (9th Cir. 2006)
- *Greene v. Bay Area Rapid Transit*, No. CV 21-00113-DMR, 2023 WL 2169497, at *12 (N.D. Cal. Jan. 18, 2023)
- *Estate of Cornejo ex rel. Solis v. City of Los Angeles*, 618 F. App'x 917, 920 (9th Cir. 2015)
- *Holcomb v. Ramar*, No. 1:13-CV-1102 AWI SKO, 2013 WL 5947621, at *4 (E.D. Cal. Nov. 4, 2013)
- *Gordon v. County of Orange*, 888 F.3d 1118, 1124 (9th Cir. 2018)
- *Mapp v. Ohio*, 367 U.S. 643, 655 (1961)
- *Beck v. Ohio*, 379 U.S. 89, 91 (1964)
- *Rosenbaum v. Washoe County*, 663 F.3d 1071, 1076 (9th Cir. 2011)
- *Cabrera v. City of Huntington Park*, 159 F.3d 374, 380 (9th Cir. 1998)
- *Orin v. Barclay*, 272 F.3d 1207, 1218 (9th Cir. 2001)

- Kaley v. United States, 571 U.S. 320, 338 (2014)
- Grant, 315 F.3d 1085
- Lassiter v. City of Bremerton, 556 F.3d 1049, 1053 (9th Cir. 2009)
- Wilkinson v. Torres, 610 F.3d 546, 554 (9th Cir. 2010)
- Hardwick v. County of Orange, 980 F.3d 733, 740-41 (9th Cir. 2020)

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