

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Cheryl D. Dresdner, et al. v. Sacramento County Jail, et al.

Dresdner v. Sacramento County Jail · No. 2:23-cv-2038 DAD CSK P · Decided November 3, 2025

SUMMARY

The United States District Court for the Eastern District of California screened plaintiffs’ second amended complaint concerning the death of Kevin Dresdner in the Sacramento County Main Jail. The court found potentially cognizable Eighth Amendment deliberate-indifference claims against Deputy Arnold and Dylan Schmidt, while dismissing other claims and defendants with leave to amend or without prejudice, including claims based on HIPAA. The court also denied plaintiffs’ motion to compel discovery and motion to file documents electronically without prejudice, while permitting electronic receipt of court orders.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	November 3, 2025
DOCKET	2:23-cv-2038 DAD CSK P
DISPOSITION	other
PROCEDURAL POSTURE	Screening order on a pro se prisoner civil-rights action under 28 U.S.C. § 1915A following the filing of a second amended complaint. The court also ruled on plaintiffs' motion to compel discovery and motion for permission to file documents electronically.
STANDARD OF REVIEW	For § 1915A screening, the court liberally construed the pro se complaint and assessed whether the allegations stated a potentially cognizable claim. Conclusory allegations were insufficient under the facial-plausibility pleading standard.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Cheryl D. Dresdner, et al. v. Sacramento County Jail, et al.

TOPICS

section 1983

prisoners rights

cruel and unusual punishment

pleadings

discovery dispute

PRACTICE AREAS

civil rights

constitutional law

prisoner civil rights

health law

civil procedure

QUESTIONS PRESENTED

1. Whether the second amended complaint plausibly alleged Eighth Amendment deliberate-indifference claims against Deputy Arnold and Dylan Schmidt.
2. Whether the claims against Chris Carlson stated due-process violations arising from an alleged failure to provide a parole hearing or appoint counsel.
3. Whether Sacramento County Jail and Adult Correctional Health were proper § 1983 defendants.
4. Whether the allegations stated a municipal-liability or supervisory-liability claim against Sheriff Jim Cooper or Sacramento County.
5. Whether claims against the California Department of Corrections and Rehabilitation were barred by Eleventh Amendment immunity.
6. Whether HIPAA provides a private right of action for alleged disclosure of medical information.
7. Whether plaintiffs' motion to compel discovery was premature before screening and entry of a discovery and scheduling order.
8. Whether a pro se plaintiff should be permitted to file documents electronically at that stage of the case.

HOLDINGS

1. The allegations that defendants knew of Dresdner's serious mental-health and safety risks, failed to monitor him, delayed his move, and returned him to an unsafe environment were sufficient at the screening stage to state potentially cognizable Eighth Amendment claims against Deputy Arnold and Dylan Schmidt.
2. The due-process claims against Chris Carlson were dismissed with leave to amend because the allegations did not identify the relevant parole-hearing context or establish that the alleged violations remained actionable after Dresdner's death.
3. Sacramento County Jail and Adult Correctional Health, as alleged municipal departments or subunits, were not proper § 1983 defendants; plaintiffs were granted leave to amend to name Sacramento County if they could plead facts satisfying municipal-liability requirements.
4. The claim against Sheriff Jim Cooper was dismissed with leave to amend because the complaint contained only a vague and conclusory assertion concerning monitoring, supervision, training, customs, and policies and did not allege personal involvement or a sufficient causal connection.
5. The claims against CDCR were dismissed as barred by Eleventh Amendment immunity.
6. The HIPAA claim was dismissed because HIPAA does not provide a private right of action.

7. The motion to compel discovery was denied without prejudice as premature because the second amended complaint had not yet been screened and no discovery and scheduling order had issued.

KEY QUOTATIONS

“A defendant does not act in a deliberately indifferent manner unless the defendant “knows of and disregards an excessive risk to inmate health or safety.”” (Section II)

“A local government, however, may not be held responsible for the acts of its employees or officials under a respondeat superior theory of liability.” (Section III.B)

“However, HIPAA does not provide any private right of action.” (Section III.E)

“A district court must construe a pro se pleading “liberally” to determine if it states a claim and, prior to dismissal, tell a plaintiff of deficiencies in his complaint and give plaintiff an opportunity to cure them.” (Section IV)

FACTUAL BACKGROUND

Kevin Dresdner was incarcerated in the Sacramento County Main Jail after a parole violation and was allegedly known as a high-risk inmate with severe mental-health issues and a history of substance and alcohol abuse. Plaintiffs alleged that he reported anxiety, depression, and fear, requested relocation after physical altercations with cellmates, and was nevertheless delayed in moving or returned to an unsafe environment without adequate monitoring. He was later found unresponsive in his cell with serious physical injuries and died.

PROCEDURAL HISTORY

Plaintiffs filed a wrongful-death action alleging Eighth Amendment, due-process, and HIPAA violations arising from Kevin Dresdner's death while incarcerated in the Sacramento County Main Jail. After dismissing the first amended complaint with leave to amend, the court screened the second amended complaint. The court found potentially cognizable Eighth Amendment claims against Deputy Arnold and Dylan Schmidt, dismissed claims against several other defendants with leave to amend or without prejudice as specified, denied the motion to compel discovery without prejudice, and denied the motion to file electronically without prejudice while permitting electronic receipt of court orders.

DISPOSITION

other

CASES CITED

- Doty v. County of Lassen, 37 F.3d 540, 546 (9th Cir. 1994)
- Jett v. Penner, 439 F.3d 1091, 1096 (9th Cir. 2006)
- Estelle v. Gamble, 429 U.S. 97, 104 (1976)
- Hutchinson v. United States, 838 F.2d 390, 394 (9th Cir. 1988)
- Farmer v. Brennan, 511 U.S. 825, 837 (1994)

- *Conn v. City of Reno*, 591 F.3d 1081, 1095 (9th Cir. 2010), cert. granted, judgment vacated sub nom. *City of Reno, Nev. v. Conn*, 563 U.S. 915 (2011), opinion reinstated, 658 F.3d 897 (9th Cir. 2011)
- *Sellers v. Procunier*, 641 F.2d 1295, 1302 (9th Cir.), cert. denied, 454 U.S. 1102 (1981)
- *Brown v. California Department of Corrections*, 554 F.3d 747, 751 (9th Cir. 2009)
- *Monell v. Department of Social Services*, 436 U.S. 658, 690-91 (1978)
- *Thompson v. City of Los Angeles*, 885 F.2d 1439, 1443 (9th Cir. 1989)
- *Vance v. County of Santa Clara*, 928 F. Supp. 993, 995-96 (N.D. Cal. 1996)
- *Sanders v. Aranas*, 2008 WL 268972, at *3 (E.D. Cal. Jan. 29, 2008)
- *Board of County Commissioners v. Brown*, 520 U.S. 397, 403 (1997)
- *Castro v. County of Los Angeles*, 833 F.3d 1060, 1073 (9th Cir. 2016) (en banc)
- *Oviatt ex rel. Waugh v. Pearce*, 954 F.2d 1470, 1474 (9th Cir. 1992)
- *City of Canton v. Harris*, 489 U.S. 378, 389 (1989)
- *McCoy v. Sacramento County Jail*, 2023 WL 1477638, at *3 (E.D. Cal. Feb. 2, 2023)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Jones v. Williams*, 297 F.3d 930, 934 (9th Cir. 2002)
- *Hansen v. Black*, 297 F.3d 930, 646 (9th Cir. 1989)
- *Johnson v. Duffy*, 588 F.2d 740, 743-44 (9th Cir. 1978)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009)
- *Starr v. Baca*, 652 F.3d 1202, 1208 (9th Cir. 2011)
- *Albright v. Oliver*, 510 U.S. 266, 271 (1994)
- *Ivey v. Board of Regents*, 673 F.2d 266, 268 (9th Cir. 1982)
- *Connick v. Thompson*, 563 U.S. 51, 61 (2011)
- *Flores v. County of Los Angeles*, 758 F.3d 1154, 1159 (9th Cir. 2014)
- *Hyde v. City of Wilcox*, 23 F.4th 863, 874 (9th Cir. 2022)
- *Quern v. Jordan*, 440 U.S. 332 (1979)
- *Alabama v. Pugh*, 438 U.S. 781 (1978) (per curiam)
- *Jackson v. Hayakawa*, 682 F.2d 1344, 1349-50 (9th Cir. 1982)
- *United States v. Streich*, 560 F.3d 926 (9th Cir. 2009)
- *Webb v. Smart Document Solutions, LLC*, 499 F.3d 1078, 1081 (9th Cir. 2007)
- *Lopez v. Smith*, 203 F.3d 1122, 1130-31 (9th Cir. 2000)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555, 570 (2007)
- *Ramirez v. County of San Bernardino*, 806 F.3d 1002, 1008 (9th Cir. 2015)