

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Hankins v. Sacramento County

Hankins · No. 2:24-cv-0150 TLN SCR P · Decided April 17, 2025

SUMMARY

The United States District Court for the Eastern District of California screened Jeremiah Hankins’s first amended 42 U.S.C. § 1983 complaint concerning psychiatric medication, medical care, and legal mail. The court found potentially cognizable Fourteenth Amendment medical-care claims against Dr. Williams, Dr. Sokolov, and a primary-care Dr. John Doe, but found no other cognizable claims as pleaded. The court denied motions for appointment of counsel without prejudice and gave plaintiff the option to proceed on the cognizable claim or file an amended complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 17, 2025
DOCKET	2:24-cv-0150 TLN SCR P
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a civil detainee's first amended complaint under 28 U.S.C. § 1915A and resolution of two motions to appoint counsel.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. On screening, allegations are accepted as true and construed in the light most favorable to the plaintiff, but the complaint must contain sufficient factual matter to state a facially plausible claim.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order
PARTIES	Jeremiah Hankins v. Sacramento County, Dr. Williams, Dr. Sokolov, Dr. John Doe, JPS Supervisor John Doe, Mailroom Supervisor John Doe, Mailroom Deputies John Does 1-10

TOPICS

prisoners rights

section 1983

fourteenth amendment

first amendment

civil procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

health law

prisoner litigation

QUESTIONS PRESENTED

1. Whether the first amended complaint stated a cognizable Fourteenth Amendment medical-care claim against the individual medical defendants.
2. Whether the complaint adequately linked the JPS supervisor and mailroom defendants to the alleged constitutional violations.
3. Whether the complaint stated a municipal-liability claim against Sacramento County under § 1983.
4. Whether the legal-mail allegations stated a First Amendment access-to-courts or confidential-legal-mail claim.
5. Whether the state-law claims were cognizable absent an allegation of compliance with the California Government Claims Act.
6. Whether exceptional circumstances warranted appointment of counsel.

HOLDINGS

1. A civil detainee states a potentially cognizable Fourteenth Amendment medical-care claim by alleging that medical defendants intentionally made treatment decisions creating a substantial risk of serious harm, failed to take objectively reasonable measures to abate that risk, and caused injury. Hankins adequately alleged such claims against Dr. Williams, Dr. Sokolov, and the primary-care physician identified as Dr. John Doe.
2. A § 1983 plaintiff must allege an actual causal link between each defendant's conduct and the constitutional deprivation; supervisory liability cannot rest solely on respondeat superior. The complaint's vague allegations concerning the JPS supervisor did not satisfy this requirement.
3. A municipality is not liable under § 1983 on a respondeat superior theory; a plaintiff must identify a policy, custom, or practice reflecting deliberate indifference that was the moving force behind the constitutional injury. Hankins did not adequately plead a Monell claim against Sacramento County.
4. A legal-mail or access-to-courts claim requires allegations linking specific defendants to the opening or reading of the plaintiff's mail; an access-to-courts claim additionally requires actual injury to contemplated or existing litigation. Hankins's allegations did not satisfy either requirement at the screening stage.
5. A plaintiff bringing state-law tort claims against a public entity or its employees must allege compliance with the California Government Claims Act. Because Hankins did not allege such compliance, his medical-negligence and negligent-emotional-distress claims were not cognizable as pleaded.
6. Appointment of counsel was not warranted because the circumstances presented did not establish exceptional circumstances, including a likelihood of success on the merits and an inability to articulate

claims in light of their complexity.

KEY QUOTATIONS

“The elements of a civil detainee’s Fourteenth Amendment medical care claim are:” (slip op. at 4)

“Municipalities cannot be held vicariously liable under § 1983 for the actions of their employees.” (slip op. at 6)

“In the Ninth Circuit, prisoners have a “protected First Amendment interest in having properly marked, confidential legal mail opened only in their presence.”” (slip op. at 7)

FACTUAL BACKGROUND

Hankins was a civil detainee at Sacramento County Jail and alleged that Dr. Williams and Dr. Sokolov prescribed and increased Zyprexa without adequately disclosing its side effects or monitoring associated risks. He alleged that he later developed gynecomastia confirmed by a mammogram and Type 2 diabetes, and that a primary-care physician failed to provide follow-up treatment for the gynecomastia. He also alleged that jail personnel opened and read legal mail, but did not identify which defendants performed those acts or allege an actual litigation injury.

PROCEDURAL HISTORY

Jeremiah Hankins, proceeding pro se, filed a § 1983 civil-rights action and a first amended complaint alleging inadequate medical care, interference with legal mail, medical negligence, and negligent infliction of emotional distress. The court screened the first amended complaint, found a potentially cognizable Fourteenth Amendment medical-care claim against Dr. Williams, Dr. Sokolov, and a primary-care physician identified as Dr. John Doe, and found no other cognizable claims at that stage. The court denied the motions to appoint counsel without prejudice and gave Hankins 21 days to elect either to proceed on the cognizable claim or file another amended complaint.

DISPOSITION

other

CASES CITED

- *Neitzke v. Williams*, 490 U.S. 319, 325, 327 (1989)
- *Jackson v. Arizona*, 885 F.2d 639, 640 (9th Cir. 1989)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555-57, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Erickson v. Pardus*, 551 U.S. 89, 93-94 (2007)
- *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974)
- *Massey v. Banning Unified School District*, 256 F. Supp. 2d 1090, 1092 (C.D. Cal. 2003)
- *Monell v. Department of Social Services*, 436 U.S. 658, 690-94 (1978)

- Long v. County of Los Angeles, 442 F.3d 1178, 1185 (9th Cir. 2006)
- AE ex rel. Hernandez v. County of Tulare, 666 F.3d 631, 636 (9th Cir. 2012)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1070, 1073 (9th Cir. 2016)
- Price v. Sery, 513 F.3d 962, 966 (9th Cir. 2008)
- Ulrich v. City & County of San Francisco, 308 F.3d 968, 984-85 (9th Cir. 2002)
- Rizzo v. Goode, 423 U.S. 362, 370-71 (1976)
- Starr v. Baca, 652 F.3d 1202, 1207-08 (9th Cir. 2011)
- Hansen v. Black, 885 F.2d 642, 646 (9th Cir. 1989)
- Gordon v. County of Orange, 888 F.3d 1118, 1124-25 (9th Cir. 2018)
- Benson v. Terhune, 304 F.3d 874, 884 (9th Cir. 2002)
- White v. Napoleon, 897 F.2d 103, 113 (3d Cir. 1990)
- Witherow v. Paff, 52 F.3d 264, 265 (9th Cir. 1995) (per curiam)
- Thornburgh v. Abbott, 490 U.S. 401, 413 (1989)
- Hayes v. Idaho Correctional Center, 849 F.3d 1204, 1211-12 (9th Cir. 2017)
- Nordstrom v. Ryan, 762 F.3d 903, 909 (9th Cir. 2014)
- Keenan v. Hall, 83 F.3d 1083, 1094 (9th Cir. 1996)
- Al-Amin v. Smith, 511 F.3d 1317, 1333 (11th Cir. 2008)
- Snyder v. Nolen, 380 F.3d 279, 290-91 (7th Cir. 2004)
- Silva v. Vittorio, 658 F.3d 1090, 1103 (9th Cir. 2011)
- Richey v. Dahne, 807 F.3d 1202, 1209 n.6 (9th Cir. 2015)
- Lewis v. Casey, 518 U.S. 343, 349 (1996)
- Zepeda v. Sullivan, No. 1:06-cv-1391 AWI GSA PC, 2009 WL 1288235, at *3 (E.D. Cal. May 7, 2009)
- Alexander v. Tilton, 2009 WL 464486, at *5 (E.D. Cal. Feb. 24, 2009)
- Mangold v. California Public Utilities Commission, 67 F.3d 1470, 1477 (9th Cir. 1995)
- Cardenas v. County of Tehama, 476 F. Supp. 3d 1055, 1070 (E.D. Cal. 2020)
- Butler v. Los Angeles County, 617 F. Supp. 2d 994, 1001 (C.D. Cal. 2008)
- Mosier v. California Department of Corrections and Rehabilitation, 2012 WL 2577524, at *3 (E.D. Cal. July 2, 2012)
- Mallard v. United States District Court, 490 U.S. 296, 298 (1989)
- Terrell v. Brewer, 935 F.2d 1015, 1017 (9th Cir. 1991)
- Wood v. Housewright, 900 F.2d 1332, 1335-36 (9th Cir. 1990)
- Wilborn v. Escalderon, 789 F.2d 1328, 1331 (9th Cir. 1986)
- Weygandt v. Look, 718 F.2d 952, 954 (9th Cir. 1983)
- Riley v. Franke, 340 F. Supp. 3d 783, 787 (E.D. Wis. 2018)
- Franco-Gonzalez v. Holder, No. 10-cv-02211 DMG (DTBx), 2013 WL 3674492, at *3-*9 (C.D. Cal. Apr. 23, 2013)
- Turner v. Rogers, 564 U.S. 431, 444-45 (2011)

- Mathews v. Eldridge, 424 U.S. 319 (1976)

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