

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Peterson v. CDCR, et al.

Peterson v. CDCR, No. 2:24-cv-1794 CSK P (E.D. Cal. June 27, 2025) · No. No. 2:24-cv-1794 CSK P · Decided
June 27, 2025

SUMMARY

The United States District Court for the Eastern District of California dismissed Ronald K. Peterson’s prisoner civil rights complaint concerning slip-and-fall injuries allegedly caused by water from a leaking roof at Folsom State Prison. The court held that the claims against CDCR and Folsom State Prison were barred by the Eleventh Amendment and that the alleged slippery-floor conditions and negligence did not state an Eighth Amendment claim. The court deferred ruling on in forma pauperis status and allowed Peterson 30 days either to voluntarily dismiss and proceed in state court or to file an amended federal complaint.

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	June 27, 2025
DOCKET	No. 2:24-cv-1794 CSK P
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights complaint under 42 U.S.C. § 1983, accompanied by an application to proceed in forma pauperis, screened under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The court applied the screening standard under 28 U.S.C. § 1915A, accepting well-pleaded allegations as true and construing the pro se complaint liberally, while determining whether the complaint was frivolous, failed to state a claim, or sought relief from an immune defendant.
PRECEDENTIAL VALUE	unpublished
PARTIES	Ronald K. Peterson v. CDCR, Folsom State Prison, Does 1-10

TOPICS

prisoners rights

section 1983

eleventh amendment immunity

pleadings

civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

civil procedure

premises liability

government immunity

QUESTIONS PRESENTED

1. Whether CDCR and Folsom State Prison were immune from Peterson's damages claims under the Eleventh Amendment.
2. Whether allegations that a leaking roof caused water to accumulate on a prison floor, resulting in slip-and-fall injuries, stated an Eighth Amendment conditions-of-confinement claim.
3. Whether the complaint adequately linked Doe defendants to specific acts or omissions violating Peterson's federal rights.
4. Whether Peterson's putative state-law tort claims could proceed in the federal action absent a cognizable federal claim and allegations demonstrating compliance with the California Government Claims Act.
5. Whether Peterson should be given leave to amend.

HOLDINGS

1. CDCR and Folsom State Prison are immune from Peterson's damages claims because California has not consented to suit.
2. Allegations of a leaking roof, wet or slippery prison floors, and resulting slip-and-fall injuries, without an additional exacerbating condition, do not state an Eighth Amendment claim.
3. The complaint failed to state a claim against Doe defendants because it did not identify their individual acts or omissions or otherwise link them to the alleged constitutional deprivation.
4. Peterson was granted leave to amend if he elected to continue in federal court, subject to pleading specific facts showing a constitutional deprivation and each defendant's involvement.

KEY QUOTATIONS

“A single defective condition— such as a slippery floor, a leaking roof, or a broken oven – by itself without additional conditions contributing to a threat to an inmate’s safety does not create an objectively sufficient and serious condition to implicate the Eighth Amendment.” (at 3)

“Remedy for this type of injury, if any, must be sought in state court under traditional tort law principles.” (at 4)

“Plaintiff’s allegations support no more than negligence, and therefore do not state a claim for relief under the Eighth Amendment.” (at 5)

FACTUAL BACKGROUND

Peterson alleged that water accumulated on a concrete floor at Folsom State Prison because of a leaking roof and lack of warning signs. He alleged that he fell on April 6, 2021, and again on December 9, 2021, sustaining injuries including pain to his tailbone, head, back, elbow, and a chipped bone. He alleged that work orders had been submitted to repair the roof and named CDCR, Folsom State Prison, and Doe defendants. He sought monetary damages.

PROCEDURAL HISTORY

Peterson filed a pro se complaint alleging that a leaking roof and water on a prison floor caused two falls and asserting intentional-tort, negligence, premises-liability, and Eighth Amendment claims. The court screened the complaint, deferred ruling on the in forma pauperis application, dismissed the complaint for failure to state a cognizable federal claim, and granted Peterson thirty days either to voluntarily dismiss and proceed in state court or to file an amended federal complaint.

DISPOSITION

dismissed

CASES CITED

- 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)
- Morgan v. Morgensen, 465 F.3d 1041, 1045 (9th Cir. 2006)
- Johnson v. Lewis, 217 F.3d 726, 731, 733-34 (9th Cir. 2000)
- Wilson v. Seiter, 501 U.S. 294, 298-99, 303 (1991)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- Farmer v. Brennan, 511 U.S. 825, 837, 842 (1994)
- Neitzke v. Williams, 490 U.S. 319, 325, 327 (1989)
- Franklin v. Murphy, 745 F.2d 1221, 1227-28 (9th Cir. 1984)
- Jackson v. Arizona, 885 F.2d 639, 640-41 (9th Cir. 1989)
- Lopez v. Smith, 203 F.3d 1122, 1130-31 (9th Cir. 2000)
- Osolinski v. Kane, 92 F.3d 934, 938 (9th Cir. 1996)
- Frost v. Agnos, 152 F.3d 1124, 1129 (9th Cir. 1998)
- LeMaire v. Maass, 12 F.3d 1444, 1457 (9th Cir. 1993)
- Reynolds v. Powell, 370 F.3d 1028, 1031 (10th Cir. 2004)
- Pickett v. Nooth, 2017 WL 4541428, at *1 (9th Cir. July 28, 2017)
- Gilman v. Woodford, 269 F. App'x 756 (9th Cir. 2008)
- Collier v. Garcia, 2018 WL 659014, at *2 (N.D. Cal. Jan. 31, 2018)
- Wallace v. Sherman, 2020 WL 4193968, at *2-5 (E.D. Cal. July 21, 2020), report and recommendation adopted, 2020 WL 5237603 (E.D. Cal. Sept. 2, 2020)

- Peterson v. Stewart, No. 23-cv-0692 DJC JDP P, 2024 WL 2023668, at *1 (E.D. Cal. May 7, 2024), findings and recommendations adopted, 2024 WL 3637981, at *1 (E.D. Cal. Aug. 2, 2024)
- Estelle v. Gamble, 429 U.S. 97, 105 (1976)
- Barren v. Harrington, 152 F.3d 1193, 1194 (9th Cir. 1998)
- Gillespie v. Civiletti, 629 F.2d 637, 642 (9th Cir. 1980)
- Brass v. County of Los Angeles, 328 F.3d 1192, 1197-98 (9th Cir. 2003)
- Wakefield v. Thompson, 177 F.3d 1160, 1163 (9th Cir. 1999)
- State v. Superior Court (Bodde), 32 Cal. 4th 1234, 1237, 1240, 1244 (2004)
- Mangold v. California Public Utilities Commission, 67 F.3d 1470, 1477 (9th Cir. 1995)
- Shirk v. Vista Unified School District, 42 Cal. 4th 201, 209 (2007), as modified (Oct. 10, 2007)
- Volis v. Housing Authority of the City of Los Angeles Employees, 670 F. App'x 543, 544 (9th Cir. 2016)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Rizzo v. Goode, 423 U.S. 362, 371 (1976)
- May v. Enomoto, 633 F.2d 164, 167 (9th Cir. 1980)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Ramirez v. County of San Bernardino, 806 F.3d 1002, 1008 (9th Cir. 2015)
- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Davis v. Scherer, 468 U.S. 183 (1984)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Erickson v. Pardus, 551 U.S. 89, 93 (2007)

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