

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
OKLAHOMA

Taylor Burke, as Personal Representative for the Estate of Michael
Reagan, Jr., deceased v. Adel Malati, M.D., in his individual capacity

Burke · No. 6:23-CV-113-JAR · Decided April 16, 2026

SUMMARY

The United States District Court for the Eastern District of Oklahoma considers a motion for summary judgment in a 42 U.S.C. § 1983 action arising from Michael Reagan Jr.'s death while detained at the Okmulgee County Criminal Justice Authority. The plaintiff alleges that the defendant, a jail medical director, was deliberately indifferent to serious medical needs through failures to implement policies, train staff, and supervise medical personnel. The opinion analyzes supervisory liability, causation, deliberate indifference, and qualified immunity; the provided text ends during the clearly established law analysis.

CASE DETAILS

COURT	United States District Court for the Eastern District of Oklahoma
WRITING FOR THE COURT	Jason A. Robertson
JURISDICTION	United States District Court for the Eastern District of Oklahoma
DECIDED	April 16, 2026
DOCKET	6:23-CV-113-JAR
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on the plaintiff's 42 U.S.C. § 1983 deliberate-indifference claim. The parties consented to magistrate-judge jurisdiction under 28 U.S.C. § 636(c)(1) and Federal Rule of Civil Procedure 73(a).
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court views the evidence in the light most favorable to the nonmovant and does not weigh evidence or resolve credibility disputes. On qualified immunity, the plaintiff bears the burden of showing both a constitutional violation and that the right was clearly established at the time of the alleged conduct; the court may address either prong first.

TOPICS

qualified immunity

section 1983

prisoners rights

summary judgment

civil procedure

PRACTICE AREAS

civil rights litigation

constitutional law

prisoner and detainee medical care

qualified immunity

summary judgment

QUESTIONS PRESENTED

1. Whether the evidence would permit a reasonable jury to find that OCCJA medical personnel were deliberately indifferent to Reagan's serious medical needs.
2. Whether the evidence created a triable issue that Dr. Malati was personally involved in, causally connected to, and deliberately indifferent toward an underlying constitutional violation through alleged failures to implement policies, train staff, or supervise medical personnel.
3. Whether the alleged supervisory conduct violated a constitutional right that was clearly established for purposes of qualified immunity.
4. Whether Dr. Malati was entitled to summary judgment based on qualified immunity.

HOLDINGS

1. The evidence, viewed in plaintiff's favor, would permit a reasonable jury to find that at least some OCCJA nurses subjectively recognized a substantial risk of serious harm to Reagan and failed to respond reasonably. The objective component was also satisfied because the harm was sufficiently serious and resulted in death.
2. Plaintiff presented sufficient evidence to create triable issues as to Dr. Malati's personal involvement and causation under theories of failure to implement necessary policies, failure to train, and failure to supervise.
3. Dr. Malati was entitled to qualified immunity because plaintiff failed to show that, at the time of the alleged conduct, clearly established precedent placed beyond debate that a largely off-site, on-call jail medical director who was not contacted about the detainee's condition and lacked documented notice of recurring systemic failures could be held liable on the asserted supervisory theories.

KEY QUOTATIONS

“The Court therefore finds that Burke, Prince, Crowson, and Estate of Jensen do not clearly establish a constitutional violation by Dr. Malati—a largely off-site, on-call medical director/jail physician who was never contacted about the decedent's seizure-related issues, never personally involved in his care, and not on notice of recurring emergency-response failures or known training deficiencies—based on his maintenance of a system that authorizes licensed nurses to call EMS without providing detailed escalation guidance.”
(Section IV.C)

“Because plaintiff has not shown that the alleged conduct violated clearly established law, the Court concludes that Dr. Malati is entitled to qualified immunity.” (Section V)

FACTUAL BACKGROUND

Michael Reagan was detained at the Okmulgee County Criminal Justice Authority for approximately ten days beginning January 3, 2020, and had a known seizure disorder for which gabapentin was prescribed. During his detention he repeatedly declined medication, experienced multiple seizure-like episodes, reported vision problems and illness, requested hospital care, and ultimately became unresponsive after being found injured and apparently seizing in a segregation cell. Emergency medical services transported him to a hospital, where he was pronounced dead. Dr. Malati was the jail's medical doctor and medical director, was present approximately once a week, had supervisory and training responsibilities, was never contacted about Reagan's condition or medication refusals, and never personally examined him.

PROCEDURAL HISTORY

Plaintiff initially filed a § 1983 action in April 2021 against the jail authority, jail personnel, and Dr. Malati, but stipulated to dismissal without prejudice as to Dr. Malati on March 31, 2022. Plaintiff initiated this action on March 30, 2023, and filed an amended complaint on March 13, 2024, alleging deliberate indifference to serious medical needs in violation of the Eighth and Fourteenth Amendments. The court granted Dr. Malati's motion for summary judgment on qualified-immunity grounds and struck the scheduled pretrial conference and jury trial.

DISPOSITION

other

CASES CITED

- Anderson v. Liberty Lobby, 477 U.S. 242, 248-49 (1986)
- Tolan v. Cotton, 572 U.S. 650, 656 (2014)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 587 (1986)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Estelle v. Gamble, 429 U.S. 97, 102-05 (1976)
- Howard v. Dickerson, 34 F.3d 978, 980 (10th Cir. 1994)
- Wilson v. Seiter, 501 U.S. 294, 298-99 (1991)
- Farmer v. Brennan, 511 U.S. 825, 836-37, 843 (1994)
- Martinez v. Beggs, 563 F.3d 1082, 1088-89 (10th Cir. 2009)
- Sealock v. Colorado, 218 F.3d 1205, 1211-12 (10th Cir. 2000)
- Wise v. Caffey, 72 F.4th 1199, 1210-12 (10th Cir. 2023)
- Schneider v. City of Grand Junction Police Department, 717 F.3d 760, 767, 769-70 (10th Cir. 2013)
- Keith v. Koerner, 843 F.3d 833, 838 (10th Cir. 2016)
- Dodds v. Richardson, 614 F.3d 1185, 1194-1200 (10th Cir. 2010)

- Perry v. Durborow, 892 F.3d 1116, 1122-23 (10th Cir. 2018)
- Burke v. Regalado, 935 F.3d 960, 997-1001 (10th Cir. 2019)
- Prince v. Sheriff of Carter County, 28 F.4th 1033, 1048-52 (10th Cir. 2022)
- Cillo v. City of Greenwood Village, 739 F.3d 451, 460 (10th Cir. 2013)
- Gann v. Cline, 519 F.3d 1090, 1092 (10th Cir. 2008)
- Pearson v. Callahan, 555 U.S. 223, 232, 236 (2009)
- Doe v. Woodard, 912 F.3d 1278, 1289 (10th Cir. 2019)
- Mullenix v. Luna, 577 U.S. 7, 12 (2015)
- Quinn v. Young, 780 F.3d 998, 1013 (10th Cir. 2015)
- Shepherd v. Robbins, 55 F.4th 810, 815 (10th Cir. 2022)
- Crowson v. Washington County, Utah, 983 F.3d 1166, 1183-84 (10th Cir. 2020)
- Estate of Jensen by Jensen v. Clyde, 989 F.3d 848, 955-59 (10th Cir. 2021)

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