

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Danielle Brown v. State of Maryland, et al.

Brown · No. 25-cv-01331-SAG · Decided January 20, 2026

SUMMARY

The United States District Court for the District of Maryland granted Defendants’ motion to bifurcate Plaintiff’s claims against an individual police officer from her Monell claims against the Baltimore Police Department. The court also stayed discovery concerning the Monell claims until the underlying constitutional claims were resolved. It concluded that bifurcation would promote judicial economy, conserve resources, and reduce the risk of juror prejudice.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Stephanie A. Gallagher
JURISDICTION	United States District Court for the District of Maryland
DECIDED	January 20, 2026
DOCKET	25-cv-01331-SAG
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 42(b) to bifurcate trial of the claims against Officer Connor Murray from the Monell claims against the Baltimore Police Department and to stay Monell-related discovery until the individual constitutional claims were resolved.
STANDARD OF REVIEW	The decision whether to bifurcate claims for trial and the timing and sequence of discovery are reviewed under the trial court's broad discretion.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- section 1983
- police misconduct
- municipal liability
- discovery dispute

PRACTICE AREAS

- civil procedure
- civil rights
- constitutional law
- municipal liability

QUESTIONS PRESENTED

1. Whether the trial of Brown's individual constitutional claims against Officer Murray should be bifurcated from the Monell claims against BPD.
2. Whether discovery concerning the Monell claims should be stayed until the underlying constitutional claims against Officer Murray are adjudicated.

HOLDINGS

1. The court may bifurcate the individual-officer claims from the Monell claims because doing so promotes judicial economy, conserves resources, permits the individual claims to proceed more quickly, and reduces the risk of juror prejudice from unrelated excessive-force evidence.
2. The court may stay discovery directed to the Monell claims until the underlying constitutional claims against Officer Murray have been resolved.

KEY QUOTATIONS

“Because bifurcation and staying Monell discovery fosters judicial economy, conserves resources, and avoids prospective juror prejudice, and because there will be no significant prejudice to Plaintiff, this Court will GRANT Defendants’ motion, ECF 41.”

“Given BPD’s well-documented history with excessive force claims, opening the door to broad-based Monell discovery before the individual incident has been litigated to conclusion creates a significant risk of unnecessary litigation expense and unnecessary use of scarce judicial resources.”

FACTUAL BACKGROUND

BPD officers pursued Donnell R. Rochester after learning that he had an active warrant. After initially concluding that the risk of harm did not justify a continued chase, Officer Murray later placed himself in the path of Rochester's moving vehicle and fired four shots when Rochester did not stop, killing him. Brown alleged that BPD maintained a custom, policy, or practice of condoning unconstitutional conduct and failed to train officers to act within constitutional bounds.

PROCEDURAL HISTORY

Danielle Brown filed claims arising from the death of her son against the Baltimore Police Department, Officer Connor Murray, the Mayor and City Council of Baltimore, and the State of Maryland. Claims against the City and State were dismissed, leaving common-law and constitutional claims against Officer Murray and Monell and indemnification claims against BPD. The district court granted Defendants' motion to bifurcate the trial and stay Monell discovery.

DISPOSITION

other

CASES CITED

- Dixon v. CSX Transportation, Inc., 990 F.2d 1440, 1443 (4th Cir. 1993)
- Paylor v. Baltimore Police Department, Civ. No. 24-02746-JRR, 2025 WL 3029548, at *4 (D. Md. Oct. 30, 2025)
- Burley v. Baltimore Police Department, Civ. No. SAG-18-1743, 2019 WL 9078713, at *3 (D. Md. Nov. 18, 2019)
- Harrod v. Mayor of Baltimore, Civ. No. SAG-18-02542, ECF 65 (D. Md. Oct. 10, 2019)
- Burgess v. Baltimore Police Department, Civ. No. RDB-15-00834, 2016 WL 1159200, at *1 (D. Md. Mar. 23, 2016)
- Roberts v. Taylor, Civ. No. CCB-18-1940, ECF 60 (D. Md. July 18, 2019)
- Peprah v. Williams, Civ. No. GLR-18-990, 2019 WL 224245, at *10 (D. Md. Jan. 15, 2019)
- Brown v. Bailey, Civ. No. RDB-11-1901, 2012 WL 2188338, at *4 (D. Md.)
- Marryshow v. Town of Bladensburg, 139 F.R.D. 318, 319–21 (D. Md. 1991)

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