

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)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND *
 DANIELLE BROWN, * * Plaintiff, * v. * Civil Case No. 25-cv-01331-SAG * STATE OF
 MARYLAND, et al., * * Defendants. * * * * * MEMORANDUM OPINION
 Plaintiff originally filed this lawsuit against the Baltimore Police Department (“BPD”), BPD
 Officer Connor Murray (“Officer Murray”), the Mayor & City Council of Baltimore (“the City”),
 and the State of Maryland (the State”) (collectively “Defendants”) for claims arising out of the
 death of her son, Donnell R. Rochester.

ECF 3. Certain claims (including those against the City and the State) were dismissed upon
 motion, leaving common law and constitutional law claims pending against Officer Murray and
 Monell and indemnification claims pending against BPD. ECF 36, 37. Currently before the Court
 is Defendants’ motion to bifurcate trial and stay Monell discovery until the underlying
 constitutional claims against the officer have been resolved.

ECF 41. The motion has been fully briefed, ECF 43, 44, and no hearing is necessary. See Loc. R.
 105.6 (D. Md. 2025). For the reasons set forth below, the motion will be granted. I. FACTUAL
 BACKGROUND The Complaint alleges that on February 19, 2022, BPD officers were running
 license plates in Baltimore City and learned from that exercise that Mr. Rochester had an active
 warrant.

ECF 3 ¶ 2. The officers pursued Mr. Rochester’s vehicle but ultimately concluded that the risk of
 harm did not justify the chase. Id. ¶¶ 27–29. When the officers located the vehicle again, Officer
 Murray intentionally placed himself in the path of Mr. Rochester’s moving vehicle to try to effect
 the arrest. Id. ¶¶ 33, 40. When Mr. Rochester did not stop, Officer Murray discharged his weapon
 into the vehicle four times, striking and killing Mr. Rochester.

Id. ¶¶ 41–43, 54. The Complaint alleges, in relevant part, that the BPD “maintained a custom, policy and practice of condoning officers [sic] conduct by knowingly, consciously, and repeatedly failing to correct a widespread pattern of unconstitutional conduct” and failed to train its officers “to conduct their law enforcement activities within constitutional bounds.” Id. ¶¶ 107, 108.

Plaintiff alleges that these failures led to Mr. Rochester’s death. II. LEGAL STANDARD The Motion seeks to bifurcate the trial of Plaintiff’s claims against Officer Murray from the Monell claim lodged against BPD, and to stay discovery relating to the Monell claim until the underlying § 1983 claims have been adjudicated. ECF 41.

The bifurcation of trials is addressed in Federal Rule of Civil Procedure 42(b): For convenience, to avoid prejudice, or to expedite and economize, the court may order a separate trial of one or more separate issues, claims, crossclaims, counterclaims, or third-party claims. When ordering a separate trial, the court must preserve any federal right to a jury trial.

The decision whether to bifurcate claims for trial is committed to the broad discretion of the trial judge. See *Dixon v. CSX Transp., Inc.*, 990 F.2d 1440, 1443 (4th Cir. 1993). Likewise, with respect to the requested stay, decisions about the appropriate timing and sequence of discovery lie within the discretion of the trial court. See Fed. R. Civ. P. 26(d)(1) (allowing discovery rules, including those pertaining to scheduling, to be modified “by court order”).

III. ANALYSIS Defendants correctly note that in a significant number of excessive force cases against the BPD and related entities, this Court has bifurcated Monell and supervisory liability claims from the underlying § 1983 claims against individual officers. See, e.g., *Paylor v. Balt. Police Dep’t*, Civ. No. 24-02746-JRR, 2025 WL 3029548, at *4 (D. Md. Oct.

30, 2025); *Burley v. Balt. Police Dep’t*, Civ. No. SAG-18-1743, 2019 WL 9078713, at *3 (D. Md. Nov. 18, 2019); *Harrod v. Mayor of Balt.*, Civ. No. SAG-18-02542, ECF 65 (D. Md. Oct. 10, 2019); *Burgess v. Balt. Police Dep’t*, Civ. No. RDB-15-00834, 2016 WL 1159200, at *1 (D. Md. Mar. 23, 2016) (“Given the derivative nature of BPD’s potential liability, bifurcation would conserve judicial resources and encourage efficient litigation.”); *Roberts v. Taylor*, Civ.

No. CCB-18-1940, ECF 60 (D. Md. Jul. 18, 2019); *Peprah v. Williams*, Civ. No. GLR-18-990, 2019 WL 224245, at *10 (D. Md. Jan. 15, 2019) (“This Court has repeatedly held that bifurcation is appropriate in cases involving § 1983 claims against individual defendants and municipalities.”); *Brown v. Bailey*, Civ. No. RDB-11-1901, 2012 WL 2188338, at *4 (“This Court has consistently held that in the context of Section 1983 claims, bifurcation of the Monell supervisory claims from the individual claims is appropriate and often desirable.”); *Marryshow v. Town of Bladensburg*, 139 F.R.D.

318, 319–21 (D. Md. 1991). In cases like this one, presenting single-incident excessive force claims, there are often relatively nuanced factual disputes about an officer’s conduct during an

interaction with a citizen. 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.

Additionally, given the graphic nature of the evidence often associated with excessive force incidents, presentation of evidence of unrelated incidents at trial creates a unique potential for prejudicing the mind of a factfinder with respect to a particular incident. Plaintiff argues that two trials would increase the time and expense to the parties and contends that there will be "identical and overlapping discovery." ECF 43 at 3.

There is no reason, however, that any discovery will have to be done twice. The discovery conducted for the claims against Officer Murray about the incident involving Mr. Rochester can be used again in the Monell trial.

The Monell discovery would largely focus on unrelated events necessary to establish the custom, policy, or practice and would be far more wide-ranging and burdensome than the discovery about the single incident on February 19, 2022. Obviously, there would be some inefficiency to conducting two separate trials, but the potential benefit if the claims against the individual defendant obviate the need to litigate the more burdensome Monell claim outweighs the added expense of the prospective second trial.

And bifurcation will allow the claims against Officer Murray to proceed to disposition more expeditiously, which benefits all parties. 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.

A separate order follows. Dated: January 20, 2026 /s/ Stephanie A. Gallagher United States District Judge