

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jakubowski v. Clendenin

No. 1:23-cv-00897-JLT-EPG (PC) (E.D. Cal. Mar. 25, 2025) · No. 1:23-cv-00897 JLT EPG (PC) · Decided
March 25, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations concerning a civil detainee’s Fourteenth Amendment claims. The court denied defendants’ Rule 12(b)(6) motion to dismiss and referred the matter for further proceedings.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 25, 2025
DOCKET	1:23-cv-00897 JLT EPG (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a civil-rights action under the Fourteenth Amendment, and defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6). The district court reviewed and adopted the magistrate judge's findings and recommendations and denied the motion to dismiss.
STANDARD OF REVIEW	De novo review under 28 U.S.C. § 636(b)(1) of the magistrate judge's findings and recommendations; Rule 12(b)(6) pleading standard.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order
PARTIES	David Jakubowski v. Stephanie Clendenin, et al.

TOPICS

- motions to dismiss
- due process
- substantive due process
- civil rights
- civil procedure

PRACTICE AREAS

- civil rights
- constitutional law
- prisoner and civil detainee litigation
- federal civil procedure

QUESTIONS PRESENTED

1. Whether Defendants' motion to dismiss was based on an incorrect Eighth Amendment deliberate-indifference standard rather than the constitutional standards applicable to a civilly committed detainee.
2. Whether Plaintiff's claim concerning freedom from punishment was governed by substantive due process rather than an Eighth Amendment deliberate-indifference standard.
3. Whether the district court should adopt the magistrate judge's findings and recommendations and deny the motion to dismiss.

HOLDINGS

1. A civilly committed detainee's claim concerning access to adequate mental-health treatment is not evaluated under the Eighth Amendment deliberate-indifference standard applicable to prisoners; Defendants' reliance on that standard was legally incorrect at the motion-to-dismiss stage.
2. The substantive due process standard applies to a civil detainee's claim that defendants subjected the detainee to punishment; deliberate indifference is not the governing standard identified by the court.
3. The district court adopted the magistrate judge's findings and recommendations in full and denied Defendants' motion to dismiss.

KEY QUOTATIONS

“the substantive due process standard applies to individuals such as Plaintiff.” (1)

“Having carefully reviewed the matter, the Court concludes the Findings and Recommendations are supported by the record and proper analysis.” (2)

FACTUAL BACKGROUND

David Jakubowski was a civil detainee housed at the Department of State Hospitals in Coalinga. He alleged that defendants violated his Fourteenth Amendment civil rights, including rights to adequate mental-health treatment and to be free from punishment as a civil detainee.

PROCEDURAL HISTORY

Defendants moved to dismiss Plaintiff's claims concerning access to adequate mental-health treatment and freedom from punishment as a civil detainee. The magistrate judge recommended denying the motion because Defendants relied on Eighth Amendment deliberate-indifference standards that did not apply to a civilly committed detainee and because substantive due process governed the punishment claim. Neither party objected, and the district court conducted de novo review, adopted the findings and recommendations in full, denied the motion, and referred the matter to the magistrate judge for further proceedings.

DISPOSITION

other

REMAND INSTRUCTIONS

The matter was referred to the magistrate judge for further proceedings.

CASES CITED

- Jones v. Blanas, 393 F.3d 918, 931-32 (9th Cir. 2004)
- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)

OPINION

(PC) Jakubowski v. Clendenin

PER CURIAM.

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8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 11 DAVID JAKUBOWSKI,) Case No.: 1:23-cv-00897 JLT EPG (PC)) 12 Plaintiff,) ORDER
ADOPTING FINDINGS AND

) RECOMMENDATIONS AND DENYING

13 v.) DEFENDANTS' MOTION TO DISMISS

) 14 STEPHANIE CLENDENIN, et al.,) (Docs. 12, 16)) 15 Defendants.)) 16) 17 David Jakubowski is a civil detainee and seeks to hold the defendants liable for violations of 18 his civil rights under the Fourteenth Amendment while housed at the Department of State Hospitals, 19 Coalinga. (See generally Doc. 1.) Defendants moved to dismiss the complaint pursuant to Rule 20 12(b)(6) of the Federal Rules of Civil Procedure, arguing Plaintiff failed to state a claim upon which 21 relief may be granted. (Doc. 12.) 22 The magistrate judge found Defendants' motion to dismiss Plaintiff's claim regarding the right 23 to access adequate mental health treatment was premised on an incorrect legal standard. (Doc. 16 at 7.) 24 The magistrate judge noted Defendants argued Plaintiff "failed to adequately plead the elements of an 25 Eighth Amendment claim for deliberate indifference to serious medical needs," (id.) and found this is 26 not the standard that applies to civilly committed detainees such as Plaintiff. (Id. at 7-9.) In addition, 27 the magistrate judge observed that "none of the cases Defendants rely upon in their motion to dismiss 28 involve civilly committed detainees—let alone those held under the [Sexually Violent Predator Act]." 1 || Ud. at 9.) Because the cited authorities did not "address the rights of civil detainees," the magistrate 2 judge found "they have no bearing on Plaintiffs claims." (/d. at 9.) 3 The magistrate judge also rejected Defendants' arguments regarding Plaintiff's second claim | 4 || the right to be free from punishment as a civil detainee. (Doc. 16 at 10-14.) The magistrate judge ag 5 || found "Defendants' position is based on an erroneous legal standard" because Defendants maintainec 6 || Plaintiff failed to show they acted with deliberate indifference. (Ud. at 12.) Instead, the magistrate 7 judge found "the substantive due process standard applies" to individuals such as Plaintiff. (/d. at 12. 8 || 13, citing Jones v. Blanas, 393 F.3d 918, 931-32 (9th Cir. 2004).) Therefore, the magistrate

judge 9 || recommended the Court deny Defendants motion to dismiss. (Jd. at 14.) 10 The Court served the Findings and Recommendations on the parties and notified them that an 11 || objections were due within 30 days. (Doc. 16 at 14.) The Court advised the parties that the “failure t 12 || file objections within the specified time may result in the waiver rights on appeal.” (/d., citing 13 || Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014).) Neither Plaintiff nor Defendants filed 14 || objections, and the time to do so has passed. 15 According to 28 U.S.C. § 636(b)(1), this Court performed a de novo review of this case. 16 || Having carefully reviewed the matter, the Court concludes the Findings and Recommendations are 17 || supported by the record and proper analysis. Thus, the Court ORDERS: 18 1. The Findings and Recommendations dated February 18, 2025 (Doc. 16) are 19 ADOPTED in full. 20 2. Defendants’ motion to dismiss (Doc. 12) is DENIED. 21 3. The matter is referred to the magistrate judge for further proceedings. 22 23 IT IS SO ORDERED. 24 |! Dated: _-March 25, 2025 (LAW pA L. wan
25 TED STATES DISTRICT JUDGE
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