UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Nathan Toomey v. Dakota County; Jamie Janvrin, in her individual and official capacities; Amanda Reiman, in her individual and official capacities; and Virginia Olson, in her individual and official capacities

Toomey · No. 25-cv-1214 (LMP/ECW) · Decided March 2, 2026

SUMMARY

The United States District Court for the District of Minnesota approved a $30,000 settlement between Nathan Toomey and Dakota County under Minn. Stat. § 466.08. The court overruled objections by nonsettling defendants Jamie Janvrin and Virginia Olson, concluding that the proposed Pierringer release did not cause formal legal prejudice and that discovery concerns did not justify delaying approval. The court dismissed Toomey's claims against Dakota County and the County's crossclaims against the other defendants with prejudice, while preserving the parties' remaining rights consistent with the Pierringer release.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Laura M. Provinzino
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	March 2, 2026
DOCKET	25-cv-1214 (LMP/ECW)
DISPOSITION	approved
PROCEDURAL POSTURE	Plaintiff and Dakota County jointly moved for judicial approval of a settlement resolving Plaintiff's claims against the County and the County's crossclaims against the other defendants. Two nonsettling defendants objected to the scope of the proposed release and requested that approval be delayed until completion of fact discovery.
STANDARD OF REVIEW	The Court evaluated whether the nonsettling defendants demonstrated formal legal prejudice sufficient to confer standing to object to the partial settlement and whether the proposed settlement required judicial approval under Minn. Stat. § 466.08.

PRECEDENTIAL VALUE	unpublished district-court order

TOPICS

civil procedure · negligence · comparative fault · municipal liability

PRACTICE AREAS

civil procedure · settlement approval · negligence · municipal liability · comparative fault

QUESTIONS PRESENTED

1. Whether Janvrin and Olson demonstrated formal legal prejudice from the proposed settlement's release language sufficient to object to the partial settlement.
2. Whether the proposed Pierringer release impaired Janvrin's and Olson's rights, defenses, or claims against Toomey or Dakota County.
3. Whether Janvrin and Olson demonstrated formal legal prejudice by losing access to written interrogatories directed to the County after the County's dismissal.
4. Whether the $30,000 settlement between Toomey and Dakota County should be approved under Minn. Stat. § 466.08.

HOLDINGS

1. A nonsettling defendant may object to a partial settlement only upon demonstrating formal legal prejudice; a tactical disadvantage in continuing litigation does not establish formal legal prejudice.
2. The proposed settlement releases only Toomey's claims against the County to the extent of the County's adjudicated share of fault and does not impair the nonsettling defendants' rights, defenses, or claims against Toomey or the County, except that it cuts off contribution or indemnification claims against the settling County.
3. The loss of access to written interrogatories directed to a settling defendant does not constitute formal legal prejudice when the nonsettling defendants retain other discovery mechanisms, including subpoenas under Federal Rule of Civil Procedure 45.
4. The $30,000 settlement between Toomey and Dakota County is approved under Minn. Stat. § 466.08, and the related claims are dismissed with prejudice.

KEY QUOTATIONS

> *"When a plaintiff reaches a settlement with only some defendants, and that settlement must be approved by a court, a non-settling defendant generally lacks standing to object to the partial settlement."*

> *"Nothing in the language of paragraph 5 purports to operate as a release of Janvrin's and Olson's rights because it is only "Plaintiff" who is releasing any "cause of action or claim for damages.""*

> *"The fact that Janvrin and Olson may be "at something of a tactical disadvantage" in losing access to one form of written discovery is not enough to show formal legal prejudice."*

FACTUAL BACKGROUND

Toomey alleged that he received inadequate medical care while detained at Dakota County's jail from County personnel and independent medical contractors Jamie Janvrin, Amanda Reiman, and Virginia Olson. Dakota County agreed to pay Toomey $30,000 in exchange for a Pierringer release resolving Toomey's claims against the County and the County's crossclaims against the other defendants. Janvrin and Olson objected that the release could impair their claims and ability to present the County's fault at trial, and that settlement approval should be delayed so they could obtain additional party discovery from the County.

PROCEDURAL HISTORY

Toomey sued Dakota County and individual medical-care defendants alleging inadequate medical care while detained in the County jail. The Court previously granted the County's motion for judgment on the pleadings in part, dismissing all claims against the County except a negligence claim based on County correctional officers. Toomey and the County then reached a $30,000 settlement involving a Pierringer release, and the Court approved the settlement, dismissed Toomey's claims against the County with prejudice, and dismissed the County's crossclaims against the remaining defendants with prejudice.

DISPOSITION

approved

CASES CITED

- Frey v. Snelgrove, 269 N.W.2d 918, 920 n.1, 921–22 (Minn. 1978)
- Pierringer v. Hoger, 124 N.W.2d 106 (Wis. 1963)
- Gardiner v. A.H. Robins Co., 747 F.2d 1180, 1189 (8th Cir. 1984)
- Alumax Mill Prods., Inc. v. Congress Fin. Corp., 912 F.2d 996, 1001–02, 1009–11 (8th Cir. 1990)
- Waller v. Fin. Corp. of Am., 828 F.2d 579, 582–84 (9th Cir. 1987)
- Witzman v. Gross, 148 F.3d 988, 990 (8th Cir. 1998)
- Burke v. Smith, 252 F.3d 1260, 1265–66 (11th Cir. 2001)
- Pitman Farms v. Kuehl Poultry LLC, 676 F. Supp. 3d 741, 750 (D. Minn. 2023)
- Chergosky v. Crosstown Bell, Inc., 463 N.W.2d 522, 525–26 (Minn. 1990)
- Econ. Premier Assurance Co. v. W. Nat'l Mut. Ins. Co., 839 N.W.2d 749, 756 (Minn. Ct. App. 2013)
- Bunce v. A.P.I., Inc., 696 N.W.2d 852, 855–56 (Minn. Ct. App. 2005)

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