

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
GEORGIA, ATLANTA DIVISION

Tiana Hill v. Clayton County, GA, et al.

Hill · No. 1:21-CV-5300-TWT · Decided December 2, 2025

SUMMARY

The United States District Court for the Northern District of Georgia granted motions to dismiss filed by Clayton County and Sheriff Victor Hill in a civil rights action arising from Tiana Hill’s treatment and childbirth while detained at the Clayton County Jail. The court held that Hill’s remaining claims under the Eighth and Fourteenth Amendments were precluded by a settlement agreement releasing medical-care-related claims against the remaining defendants. The court also dismissed the punitive-damages claim, denied the motion to stay discovery as moot, directed entry of final judgment, and closed the case.

CASE DETAILS

COURT	United States District Court for the Northern District of Georgia, Atlanta Division
WRITING FOR THE COURT	Thomas W. Thrash, Jr.
JURISDICTION	United States District Court for the Northern District of Georgia, Atlanta Division
DECIDED	December 2, 2025
DOCKET	1:21-CV-5300-TWT
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved to dismiss the Third Amended Complaint under Federal Rule of Civil Procedure 12(b)(6), and Clayton County separately moved to stay discovery. The court granted the motions to dismiss, denied the discovery motion as moot, directed entry of final judgment, and closed the case.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded facts as true and construes them in the plaintiff’s favor. Dismissal is proper when the alleged facts fail to state a plausible claim for relief.
PRECEDENTIAL VALUE	Unknown; district-court opinion with no reported citation.
PARTIES	Tiana Hill v. Clayton County, GA, Victor Hill, Clayton County Board of Commissioners, CorrectHealth Clayton, LLC, Charles Clopton,

TOPICS

section 1983 civil rights motions to dismiss contracts pleadings

PRACTICE AREAS

civil rights constitutional law federal civil procedure settlement enforcement

QUESTIONS PRESENTED

1. Whether Hill's remaining § 1983 claims against Clayton County and Sheriff Victor Hill were barred by the settlement agreement.
2. Whether Hill's request for punitive damages against Sheriff Victor Hill in his individual capacity could survive after dismissal of the substantive claims.
3. Whether the motion to stay discovery should be denied as moot after dismissal of the action.

HOLDINGS

1. The settlement agreement barred Hill's remaining § 1983 claims against Clayton County and Sheriff Victor Hill because those claims were medical claims derived from the delivery or denial of medical care, notwithstanding Hill's attempt to characterize them as cruel-and-unusual-punishment claims.
2. Hill's request for punitive damages against Sheriff Victor Hill in his individual capacity could not survive because no substantive cause of action remained.
3. The motion to stay discovery was denied as moot after the court dismissed the claims and directed entry of final judgment.

KEY QUOTATIONS

“The heart of her remaining § 1983 claims is the denial and inadequate delivery of medical care. She cannot escape this fact by merely relabeling “medical care” as “relief or release” or relabeling “denial of medical care” as “cruel and unusual punishment.”” (7)

“The Court is sympathetic to Hill and all that she allegedly suffered, but she agreed to this restrictive settlement language— whether or not she fully grasped its scope.” (8)

FACTUAL BACKGROUND

Beginning in September 2019, Tiana Hill was detained in the Clayton County Jail while pregnant. She allegedly repeatedly requested relief or release because of her pregnancy and, on December 28, 2019, reported vaginal bleeding and requested care, but jail staff allegedly rejected her requests. She allegedly went into labor in her cell, gave birth after approximately thirteen hours, and the child died several days later.

PROCEDURAL HISTORY

Hill filed a civil-rights action arising from the alleged denial of pregnancy-related care while she was detained in the Clayton County Jail. After earlier dismissal orders, claims against CorrectHealth Clayton, LLC and Dr. Charles Clopton were settled and those defendants were dismissed with prejudice. The court enforced the settlement agreement and required Hill to file an amended complaint consistent with its terms; after an unsuccessful appeal for lack of appellate jurisdiction, Hill filed the Third Amended Complaint. Clayton County and Sheriff Victor Hill then moved to dismiss the remaining pleading.

DISPOSITION

dismissed

CASES CITED

- 941 F.3d 1116, 1122 (11th Cir. 2019)
- 556 U.S. 662, 678 (2009)
- 550 U.S. 544, 556 (2007)
- 711 F.2d 989, 994-95 (11th Cir. 1983)
- 40 F.3d 247, 251 (7th Cir. 1994)
- 753 F.2d 974, 975 (11th Cir. 1985)
- 551 U.S. 89, 93 (2007)
- 2025 WL 1445546, at *2 (11th Cir. May 20, 2025)

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