

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA,
HELENA DIVISION

Uhrich v. Salmonsén

Uhrich · No. CV 25-16-H-BMM · Decided April 14, 2026

SUMMARY

The United States District Court for the District of Montana granted Defendants’ motion to stay proceedings under Younger abstention because Plaintiff’s excessive-force claims arose from an incident underlying ongoing state criminal proceedings. The court denied Plaintiff’s discovery motion without prejudice, stayed and administratively closed the federal case pending completion of the state proceedings, and directed the parties to provide notice when those proceedings and any direct appeals conclude.

CASE DETAILS

COURT	United States District Court for the District of Montana, Helena Division
JURISDICTION	United States District Court for the District of Montana, Helena Division
DECIDED	April 14, 2026
DOCKET	CV 25-16-H-BMM
DISPOSITION	other
PROCEDURAL POSTURE	In a federal prisoner civil-rights action seeking money damages for alleged excessive force, defendants moved to stay or dismiss under Younger abstention, and plaintiff moved for discovery.
STANDARD OF REVIEW	The court applied the Younger abstention framework and determined whether a stay, rather than dismissal, was the appropriate procedural remedy for a damages action.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation
PARTIES	Tyler Uhrich v. Jim Salmonsén, et al.

TOPICS

- civil rights
- civil procedure
- criminal procedure
- section 1983
- remedies

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Younger abstention applied because the federal excessive-force claims arose from the same incident as ongoing state criminal proceedings.
2. Whether the federal damages action should be stayed or dismissed when Younger abstention applies.
3. Whether plaintiff's renewed discovery motion should be granted while the federal case is stayed.

HOLDINGS

1. Younger abstention applied because the state criminal proceedings were ongoing, implicated Montana's important interest in enforcing its criminal laws, provided Uhrich an adequate opportunity to raise his federal-rights concerns, and a ruling on the excessive-force claims would interfere with the state criminal litigation.
2. When Younger abstention applies to a federal action seeking monetary damages, the proper procedural remedy is to stay the federal proceedings pending the outcome of the state proceedings rather than dismiss the action.
3. The discovery motion was denied because the case was stayed, but the motion could be renewed if defendants' disclosures remained incomplete.

KEY QUOTATIONS

"If all four prongs of the Younger test are satisfied, then the Court must abstain from adjudicating Uhrich's claims." (Section I)

"If abstention is appropriate under Younger and the federal plaintiff seeks monetary damages, as Uhrich does here, the proper procedural remedy is to stay the federal proceedings pending the outcome of the ongoing state proceedings." (Section I)

FACTUAL BACKGROUND

Uhrich alleged that defendants used excessive force against him at Montana State Prison on April 9, 2024, in violation of the Eighth Amendment, and sought only money damages. The same physical altercation was the basis for an ongoing criminal prosecution against him in the Third Judicial District Court for Powell County, Montana. Trial in the state criminal case was scheduled for June 1, 2026. Uhrich also sought discovery, including an incident report, a staff-conduct investigation, and video and audio materials.

PROCEDURAL HISTORY

Uhrich filed an amended complaint alleging that defendants violated his Eighth Amendment rights by using excessive force during an April 9, 2024 incident. The same incident formed the basis of an ongoing criminal prosecution against Uhrich in Montana state court. The district court granted defendants' motion to stay under Younger, denied Uhrich's discovery motion subject to renewal, stayed the federal proceedings pending the criminal case, and administratively closed the action.

DISPOSITION

other

CASES CITED

- *Younger v. Harris*, 401 U.S. 37 (1971)
- *Cook v. Harding*, 879 F.3d 1035, 1039 (9th Cir. 2018)
- *ReadyLink Healthcare, Inc. v. State Comp. Ins. Fund*, 754 F.3d 754, 759 (9th Cir. 2014)
- *Sprint Commc'ns., Inc. v. Jacobs*, 571 U.S. 69, 81 (2013)
- *Duke v. Gastelo*, 64 F.4th 1088, 1095 (9th Cir. 2023)
- *Meredith v. Oregon*, 321 F.3d 807, 816-17 (9th Cir. 2003)
- *Gilbertson v. Albright*, 381 F.3d 965, 968 (9th Cir. 2004)
- *Gilbertson v. Albright*, 381 F.3d 965, 984 (9th Cir. 2004)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA HELENA DIVISION TYLER UHRICH, CV 25–16–H–BMM Plaintiff, vs. ORDER JIM SALMONSEN, ET AL., Defendants. Two motions are pending before the Court: Defendants’ Motion to Stay or Dismiss, and Plaintiff Tyler Uhrich’s Motion for Discovery. (Docs. 37 and 38.) This matter is stayed. Uhrich’s motion is denied.

I. MOTION TO STAY OR DISMISS Defendants move to stay or dismiss this case pursuant to *Younger v. Harris*, 401 U.S. 37 (1971). Defendants assert that adjudication of Uhrich’s claims here would impact ongoing state court criminal proceedings. (Doc. 37 at 1.) Uhrich has not responded to this motion. Uhrich’s Amended Complaint generally alleges that Defendants violated his Eighth Amendment rights by using excessive force against him on April 9, 2024.

(Doc. 13 at 4 – 5.) Uhrich seeks only money damages as relief. (Doc. 13 at 5.) What happened on April 9, 2024, also serves as the basis of an ongoing criminal prosecution of Uhrich in the Third Judicial District Court, Powell County, Montana. (Doc. 37-1.) Trial in that case is currently scheduled for June 1, 2026, according to the online calendar for the Powell County District Court.

(At the time of filing Defendants’ motion, the trial was scheduled for March 30, 2026. (Doc. 37 at 3.)) As a result, Defendants contend this Court should stay or dismiss its proceedings pursuant to *Younger*. “Abstention in civil cases ‘is appropriate only when the state proceedings: (1) are ongoing, (2) are quasi-criminal enforcement actions or involve a state’s interest in enforcing the orders and judgments of its courts, (3) implicate an important state interest, and (4) allow litigants to raise federal challenges.’” *Cook v. Harding*, 879 F.3d 1035, 1039 (9th Cir.

2018) (quoting *ReadyLink Healthcare, Inc. v. State Comp. Ins. Fund*, 754 F.3d 754, 759 (9th Cir. 2014), *Sprint Commc'ns., Inc. v. Jacobs*, 571 U.S. 69, 81 (2013)). If these “threshold elements” are met, then the Court must “consider whether the federal action would have the practical effect of enjoining the state proceedings and whether an exception to *Younger* applies.” *ReadyLink*, 754 F.3d at 759 (citation omitted).

The “threshold elements” of *Younger* are present. First, Uhrich’s allegations all relate to a specific incident that gave rise to ongoing criminal proceedings against him. State criminal enforcement actions implicate an important state interest to enforce the local and state laws. See *Younger*, 401 U.S. at 43-44. Montana has a significant state interest in enforcing the criminal laws of Montana.

The Court may not interfere with those interests when the process is ongoing. Second, Uhrich will have an adequate opportunity in the Montana state district court to raise any issues he has regarding his federal rights. “[T]he threat to the plaintiff’s federally protected rights must be one that cannot be eliminated by his defense against a single criminal prosecution.” *Younger*, 401 U.S. at 46. “The Supreme Court has been clear that *Younger* abstention is motivated by the need to refrain from granting injunctive relief where a litigant has adequate legal remedies and therefore does not face immediate irreparable injury, and by the even more vital consideration of comity.” *Duke v. Gastelo*, 64 F.4th 1088, 1095 (9th Cir.

2023) (internal citation omitted). Uhrich will have the opportunity to raise his federal rights against excessive force in that is an aspect of his defense to the charges related to the physical altercation occurring at the Montana State Prison. Uhrich also will have the state appeals process to vindicate his rights regarding his prosecution. Uhrich has opportunities within his ongoing criminal proceedings in the Montana state courts to address any alleged violations of his federal rights. “*Younger* abstention is proper only when the federal relief sought would interfere in some manner in the state court litigation.” *Meredith v. Oregon*, 321 F.3d 807, 816–17 (9th Cir.

2003). Here, a determination regarding Uhrich’s claims would have the effect of interfering with the “state courts’ ability to enforce constitutional principles and put the federal court in the position of making a premature ruling on a matter of constitutional law.” *Gilbertson v. Albright*, 381 F.3d 965, 984 (9th Cir. 2004). If this Court found that officers had used excessive force, that conclusion would likely predetermine issues in Uhrich’s state criminal trial.

If all four prongs of the *Younger* test are satisfied, then the Court must abstain from adjudicating Uhrich’s claims. Absent exceptional circumstances, district courts do not have discretion to avoid the doctrine if the elements of *Younger* abstention exist in a particular case. If abstention is appropriate under *Younger* and the federal plaintiff seeks monetary damages, as Uhrich does here, the proper procedural remedy is to stay the federal proceedings pending the outcome of the ongoing state proceedings.

Gilbertson, 381 F.3d at 968. This matter is stayed, pending the outcome of Uhrich's criminal trial.

II. MOTION FOR DISCOVERY Uhrich has renewed his motion for discovery, because Defendants have not responded to his previous requests. (Doc. 38.) Uhrich's motion includes specific items that he claims to have sought and not received, including an incident report, a copy of the investigation into staff conduct, and video and audio.

Id. Defendants oppose the motion. (Doc. 39.) Defendants claim to have provided all of the requested items to Plaintiff Uhrich, after the date of Plaintiff's filing. (Doc. 39 at 3.) Given the stay in this matter, the motion will be denied, subject to renewal in the future if Defendants' disclosures remain incomplete. Based upon the foregoing, IT IS ORDERED that: 1. Uhrich's motion (Doc.

38) is DENIED, subject to renewal. 2. Defendants' motion (Doc. 37) is GRANTED. This matter is STAYED. The Clerk of Court is directed to administratively close the case. The parties are directed to notify the Court within 30 days of the completion of state proceedings, including any direct appeals. 3. At all times, Uhrich must immediately advise the Court and opposing counsel of any change of address.

Failure to do so may result in dismissal. DATED this 14th day of April, 2026.) United States District Court