

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
NORTH CAROLINA

Seth Whitaker Clabough, as Executor of the Estate of Casey Howard
Clabough v. Robert G. Jones, in his individual capacity, Robert W.
Jones, in his individual capacity, Natasha Green, LPN, Nora
Mansfield, LPN, and Southern Health Partners, Inc.

Case No. 2:24-CV-00062-M · No. 2:24-CV-00062-M · Decided March 18, 2026

SUMMARY

The United States District Court for the Eastern District of North Carolina reviews objections to a magistrate judge’s Memorandum and Recommendation concerning a motion to dismiss claims against jail administrators. The court adopts the recommendation, grants the Jones Defendants’ motion to dismiss, and concludes that the alleged deliberate-indifference claims were not based on a violation of clearly established law sufficient to overcome qualified immunity.

CASE DETAILS

COURT	United States District Court for the Eastern District of North Carolina
WRITING FOR THE COURT	Richard E. Myers I
JURISDICTION	United States District Court for the Eastern District of North Carolina
DECIDED	March 18, 2026
DOCKET	2:24-CV-00062-M
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's memorandum and recommendation recommending dismissal of his claims against the Jones Defendants. The district court conducted de novo review of the portions subject to objection and reviewed the remainder for clear error.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b), the district court reviews objected-to portions of a magistrate judge's recommendation de novo and unobjected-to portions for clear error. A Rule 12(b)(6) motion tests the legal sufficiency of the complaint; well-pleaded factual allegations are accepted as true and

	construed in the plaintiff's favor, but legal conclusions and conclusory allegations are not accepted as true.
PRECEDENTIAL VALUE	Unknown; federal district court order with no reporter citation or stated precedential designation.
PARTIES	Seth Whitaker Clabough, as Executor of the Estate of Casey Howard Clabough v. Robert G. Jones, Robert W. Jones, Natasha Green, LPN, Nora Mansfield, LPN, Southern Health Partners, Inc.

TOPICS

[motions to dismiss](#)
[qualified immunity](#)
[prisoners rights](#)
[fourteenth amendment](#)
[civil procedure](#)

PRACTICE AREAS

[Civil procedure](#)
[Civil rights](#)
[Constitutional law](#)
[Prisoner and detainee rights](#)

QUESTIONS PRESENTED

1. Whether the district court properly reviewed and adopted the magistrate judge's memorandum and recommendation under 28 U.S.C. § 636(b)(1) and Rule 72(b).
2. Whether the complaint plausibly alleged that the Jones Defendants violated the decedent's Fourteenth Amendment rights through deliberate indifference to serious medical or psychiatric needs.
3. Whether the Jones Defendants were entitled to qualified immunity because the alleged constitutional right was not clearly established in December 2022 and January 2023.
4. Whether the district court was required to analyze the constitutional-violation prong of qualified immunity before deciding the clearly-established-law prong.
5. Whether allegations that jail policies or federal detention standards were violated were sufficiently pleaded rather than conclusory.

HOLDINGS

1. A district court must review objected-to portions of a magistrate judge's recommendation de novo and may review unobjected-to portions for clear error before adopting the recommendation.
2. A complaint survives a Rule 12(b)(6) motion only when its well-pleaded factual allegations, accepted as true and construed favorably to the plaintiff, plausibly state a claim; legal conclusions, labels, and naked assertions are insufficient.
3. The Jones Defendants were entitled to qualified immunity because the complaint did not identify a clearly established Fourteenth Amendment right that would have made their alleged failure to take additional or different suicide-prevention measures unconstitutional under the circumstances.
4. A court may decide the clearly-established-law prong of qualified immunity without first deciding whether the complaint plausibly alleges a constitutional violation.

5. An allegation that defendants violated unspecified jail policies or federal detention standards is conclusory when the complaint does not identify the particular policy or standard and the factual basis for the alleged violation.

KEY QUOTATIONS

“A Rule 12(b)(6) motion to dismiss tests the legal sufficiency of the complaint; “it does not resolve contests surrounding the facts, the merits of a claim, or the applicability of defenses.”” (at 2)

“It was not clearly established in December 2022 and January 2023 that the Defendants’ failure to take additional or different action in response to the risk of decedent’s suicide was a constitutional violation.” (at 19-20)

FACTUAL BACKGROUND

The decedent was detained at the Albemarle District Jail and had serious mental-health and suicide-related needs, including a schizophrenia diagnosis and alleged suicide risk. The complaint alleged that the Jones Defendants, jail administrators, knew that the decedent had not been placed in a suicide smock or safe cell and failed to take additional precautions, consult mental-health providers, or arrange emergency psychiatric care. The allegations also stated that the Jones Defendants had taken some affirmative measures, including placing the decedent in a single cell in a psychiatric housing block and implementing suicide watch.

PROCEDURAL HISTORY

Defendants Robert G. Jones and Robert W. Jones moved to dismiss under Rule 12(b)(6). Magistrate Judge Brian S. Meyers recommended granting the motion. After considering the parties' objections and responses, the district court adopted the memorandum and recommendation and dismissed Plaintiff's claims against the Jones Defendants with prejudice.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 271 (1976)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Megaro v. McCollum, 66 F.4th 151, 157 (4th Cir. 2023)
- Republican Party of North Carolina v. Martin, 980 F.2d 943, 952 (4th Cir. 1992)
- Nemet Chevrolet, Ltd. v. Consumeraffairs.com, Inc., 591 F.3d 250, 255 (4th Cir. 2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- ACA Financial Guaranty Corp. v. City of Buena Vista, Virginia, 917 F.3d 206, 211 (4th Cir. 2019)
- King v. Riley, King v. Riley, 76 F.4th 259, 264-66 (4th Cir. 2023)

- Harlow v. Fitzgerald, 457 U.S. 800, 818 (1982)
- Mays v. Sprinkle, 992 F.3d 295, 300-01 (4th Cir. 2021)
- Ashcroft v. al-Kidd, 563 U.S. 731, 735 (2011)
- Reichle v. Howards, 566 U.S. 658, 664 (2012)
- Pfaller v. Ammonette, 55 F.4th 436, 445-48 (4th Cir. 2022)
- Thorpe v. Clarke, 37 F.4th 926, 933-40 (4th Cir. 2022)
- Malley v. Briggs, 475 U.S. 335, 341 (1986)
- Short v. Hartman, 87 F.4th 593, 611 (4th Cir. 2023)
- Pearson v. Callahan, 555 U.S. 223, 232, 236-42 (2009)
- Mitchell v. Forsythe, 472 U.S. 511, 526 (1985)
- Hixson v. Moran, 1 F.4th 297, 303 (4th Cir. 2021)
- Scinto v. Stansberry, 841 F.3d 219, 225 (4th Cir. 2016)
- Taylor v. Barkes, 575 U.S. 822, 826 (2015)
- Wells v. Fuentes, 126 F.4th 882, 889-90 (4th Cir. 2025)
- Rambert v. City of Greenville, 107 F.4th 388, 402 (4th Cir. 2024)
- Short v. Smoot, 436 F.3d 422, 427, 430 (4th Cir. 2006)