

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Michael Alan Dean Hill v. County of El Dorado, et al.

Hill v. County of El Dorado · No. 2:25-cv-1472 TLN CKD P · Decided December 29, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Michael Alan Dean Hill’s motion to proceed in forma pauperis. The court dismisses his 42 U.S.C. § 1983 complaint with leave to amend, finding that the allegations do not sufficiently establish objective deliberate indifference, municipal liability, or personal participation by the named defendants.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Carolyn K. Delaney
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 29, 2025
DOCKET	2:25-cv-1472 TLN CKD P
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a pro se pretrial detainee’s 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915A, following a grant of in forma pauperis status.
STANDARD OF REVIEW	The court screened the prisoner complaint under 28 U.S.C. § 1915A and applied the Fourteenth Amendment objective deliberate-indifference standard for pretrial detainee medical-care claims. A complaint must contain sufficient factual matter to state a plausible claim and may not rely on conclusory allegations.
PRECEDENTIAL VALUE	unknown
PARTIES	Michael Alan Dean Hill v. County of El Dorado, El Dorado County Sheriff’s Department, Dr. Chapman, Nurse Jennifer, Correctional officers, Correctional sergeants

TOPICS

- section 1983
- prisoners rights
- due process
- pleadings
- civil procedure

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether the complaint stated a Fourteenth Amendment medical-care claim by a pretrial detainee under 42 U.S.C. § 1983.
2. Whether the complaint stated a municipal-liability claim against El Dorado County or the El Dorado County Sheriff's Department based on alleged failure to train and supervise medical personnel.
3. Whether the allegations adequately established personal participation by the individually named correctional officers and sergeants.
4. Whether the complaint should be dismissed under 28 U.S.C. § 1915A or whether plaintiff should receive leave to amend.

HOLDINGS

1. The complaint failed to state a Fourteenth Amendment claim because the allegations against Dr. Chapman and Nurse Jennifer showed, at most, negligence, lack of due care, or medical malpractice, and did not plausibly allege objectively unreasonable conduct creating or disregarding an obvious substantial risk of serious harm.
2. The complaint failed to state a municipal-liability claim because bare allegations of failure to train and supervise, together with conclusory assertions that defendants knew or should have known about substandard care, did not show deliberate indifference by municipal policymakers.
3. The complaint failed to state claims against the named correctional officers and sergeants because it did not allege how each individual personally participated in the alleged constitutional deprivation.
4. The complaint was dismissed with leave to amend because it was possible that plaintiff could allege additional facts sufficient to state a claim.

KEY QUOTATIONS

"To satisfy the third element, the plaintiff must show that the defendant's actions were "objectively unreasonable," which requires a showing of "more than negligence but less than subjective intent—something akin to reckless disregard."" (at 2)

"Your complaint is being dismissed with leave to amend because the facts you alleged are insufficient to state a claim against any defendant." (at 4)

FACTUAL BACKGROUND

Plaintiff alleged that while detained at the South Lake Tahoe Jail in June 2023, Dr. Chapman misdiagnosed a sore that developed into a staph infection. Plaintiff alleged that medical staff failed to provide timely treatment despite repeated visits and that he eventually required emergency-room treatment after the infection worsened. He also alleged that El Dorado County and its Sheriff's Department failed to train and oversee jail medical

personnel and that various correctional officers and sergeants participated in or failed to prevent the alleged deprivation.

PROCEDURAL HISTORY

Plaintiff, detained at the El Dorado County Jail, filed a pro se complaint alleging inadequate medical care and municipal failure to train and supervise. The court granted plaintiff's motion to proceed in forma pauperis, screened the complaint, found that it failed to state a constitutional claim against any defendant, dismissed the complaint with leave to amend, and allowed thirty days to file a first amended complaint.

DISPOSITION

dismissed

CASES CITED

- Bell v. Wolfish, 441 U.S. 520, 535-37 (1979)
- Sandoval v. County of San Diego, 985 F.3d 657, 669 (9th Cir. 2021)
- Rodriguez v. City of Los Angeles, 891 F.3d 776, 802 (9th Cir. 2018)
- Gordon v. County of Orange, 888 F.3d 1118, 1125 (9th Cir. 2018)
- Toguchi v. Chung, 391 F.3d 1051, 1060 (9th Cir. 2004)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Ashcroft v. Iqbal, 556 U.S. 662, 676-77 (2009)
- Leer v. Murphy, 844 F.2d 628, 633 (9th Cir. 1988)
- Noll v. Carlson, 809 F.2d 1446, 1448-49 (9th Cir. 1987)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Loux v. Rhay, 375 F.2d 55, 57 (9th Cir. 1967)

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