

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION

Carswell v. Hunt County, Texas

Carswell v. Hunt County, Texas · No. 3:20-CV-02935-N · Decided March 9, 2026

SUMMARY

The United States District Court for the Northern District of Texas denied Hunt County’s motion to reconsider its prior refusal to dismiss Gwendolyn Carswell’s conditions-of-confinement claim arising from Gary Lynch’s death in county custody. The court held that the claim did not require pleading deliberate indifference and that Carswell plausibly alleged causation. The court also denied Hunt County’s alternative request to certify the issue for interlocutory appeal.

CASE DETAILS

COURT	United States District Court for the Northern District of Texas, Dallas Division
WRITING FOR THE COURT	David C. Godbey
JURISDICTION	United States District Court for the Northern District of Texas, Dallas Division
DECIDED	March 9, 2026
DOCKET	3:20-CV-02935-N
DISPOSITION	other
PROCEDURAL POSTURE	The court considered Hunt County's motion for reconsideration under Federal Rule of Civil Procedure 54(b) of an interlocutory order denying dismissal of a conditions-of-confinement claim, together with Hunt County's alternative request for certification for interlocutory appeal under 28 U.S.C. § 1292(b).
STANDARD OF REVIEW	Under Rule 54(b), a district court may reconsider an interlocutory order for any reason it deems sufficient, including as justice requires; reconsideration is generally appropriate to correct manifest errors of law or fact or to consider newly discovered evidence. The court also applied the standard under 28 U.S.C. § 1292(b) for certifying an interlocutory appeal.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

TOPICS

motion for reconsideration

motions to dismiss

section 1983

civil rights

interlocutory appeal

PRACTICE AREAS

civil rights

constitutional law

municipal liability

federal civil procedure

QUESTIONS PRESENTED

1. Whether the court should reconsider its determination that Carswell plausibly pleaded a conditions-of-confinement claim without alleging deliberate indifference by Hunt County.
2. Whether Carswell plausibly pleaded that Hunt County's alleged jail practices caused Lynch's death.
3. Whether the court should certify its interlocutory order for appeal under 28 U.S.C. § 1292(b).

HOLDINGS

1. A plaintiff asserting a conditions-of-confinement claim need not plead deliberate indifference by the municipality when the claim is based on unconstitutional conditions imposed on pretrial detainees.
2. Carswell plausibly alleged that Hunt County's alleged jail practices caused Lynch's death, and the alleged gas-leak disruption did not render causation implausible.
3. The court denied certification under 28 U.S.C. § 1292(b) because the order did not present a controlling legal question with substantial ground for difference of opinion warranting immediate appeal.

FACTUAL BACKGROUND

Gary Lynch entered Hunt County Jail on February 12, 2019, and allegedly experienced declining health and symptoms that he and other detainees reported to jail personnel. He died in his cell on February 23, 2019, from aortic valve endocarditis with myocardial abscess, which the complaint alleged was treatable with appropriate medical intervention. Carswell alleged that Hunt County's practices included failing to provide emergency medical care, monitor detainees, staff the facility adequately, and communicate medical needs between shifts. Hunt County also argued that a gas-leak evacuation disrupted jail operations before Lynch's death.

PROCEDURAL HISTORY

Carswell sued Hunt County under 42 U.S.C. § 1983 concerning the death of Gary Lynch in Hunt County Jail. The court previously partially granted Hunt County's motion to dismiss, but held that Carswell sufficiently pleaded a conditions-of-confinement claim. Hunt County moved for reconsideration, arguing that the claim required deliberate-indifference allegations and that causation was inadequately pleaded. The court denied reconsideration and denied certification for interlocutory appeal.

DISPOSITION

other

CASES CITED

- Carswell v. Hunt County, 2025 WL 936661 (N.D. Tex. 2025)
- Austin v. Kroger Texas, L.P., 864 F.3d 326, 336-337 (5th Cir.)
- Cobell v. Jewell, 802 F.3d 12, 25-26 (D.C. Cir.)
- Dos Santos v. Bell Helicopter Textron, Inc. Dist., 651 F. Supp. 2d 550, 553 (N.D. Tex.)
- Choice Hotels International, Inc. v. Goldmark Hospitality, LLC, 2014 WL 642738, at *1 (N.D. Tex.)
- Piotrowski v. City of Houston, 237 F.3d 567, 578 (5th Cir.)
- Monell v. Department of Social Services, 436 U.S. 658, 694
- Rangel v. Wellpath, LLC, 2024 WL 1160913, at *6 (N.D. Tex.)
- Sanchez v. Young County, 956 F.3d 785, 791 (5th Cir.)
- Valle v. City of Houston, 613 F.3d 536, 542 (5th Cir.)
- Sanchez, 866 F.3d at 274
- Duvall v. Dallas County, 631 F.3d 203, 207 (5th Cir.)
- Shepherd v. Dallas County, 591 F.3d 445, 452 (5th Cir.)
- Estate of Henson v. Wichita County, 795 F.3d 456, 463 (5th Cir.)
- Cadena v. El Paso County, 946 F.3d 717, 727 (5th Cir.)
- Alexander v. Philip R. Taft Psy D & Associates, P.L.L.C., 165 F.4th 309, 319 (5th Cir.)
- Lillie v. Stanford Trust Co., 2015 WL 13741932, at *4 (N.D. Tex.)