

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Cravotta v. County of Sacramento

Cravotta · No. 2:22-cv-00167-DJC-AC · Decided February 26, 2025

SUMMARY

The United States District Court for the Eastern District of California addresses three motions to dismiss claims arising from the alleged assault of a former pretrial detainee by his cellmate. The court dismisses in part claims under the Fourteenth Amendment, the Rehabilitation Act, the Americans with Disabilities Act, California Government Code section 845.6, and related state-law theories, generally with leave to amend. The order concerns alleged deliberate indifference, failure to protect, failure to summon medical care, disability discrimination, and related liability of county and medical-service defendants.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Daniel J. Calabretta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	February 26, 2025
DOCKET	2:22-cv-00167-DJC-AC
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff's operative Third Amended Complaint asserted claims under 42 U.S.C. § 1983, the Rehabilitation Act, the ADA, California Government Code section 845.6, the Bane Act, and negligence. Three groups of defendants moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).
STANDARD OF REVIEW	On a Rule 12(b)(1) motion, the plaintiff bears the burden of establishing Article III standing, requiring injury in fact, traceability, and redressability. On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and construes them in the plaintiff's favor, but dismisses claims lacking a cognizable legal theory or sufficient facts to state a plausible entitlement to relief. Leave to amend is generally granted absent undue delay, bad faith, prejudice, or futility.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Anthony Cravotta II v. County of Sacramento, Sacramento County Sheriff's Department, Regents of the University of California, State of California, California Department of State Hospitals, Scott Jones, Christopher Sturgis, Christina Albright-Mundy, Jacob Saesee, Daisy Rollon, Bradley Whiting, Jacquelyn Blevins, Ramandeep Singh, Andrea Haynes, Moises Paredes, Ronnie McLean, Justin Higley, Takuya Noda, Bennett Preston, Nicole Garces-Barrella, Diane Oran, Jaclyn DeCarlo, Melissa Turner

TOPICS

section 1983

prisoners rights

motions to dismiss

due process

ada / disability

PRACTICE AREAS

civil rights

constitutional law

civil procedure

health law

disability discrimination

torts

QUESTIONS PRESENTED

1. Whether the Third Amended Complaint plausibly alleged Fourteenth Amendment deliberate-indifference claims against the various mental-health, classification, housing, monitoring, and medical-response defendants.
2. Whether Cravotta had Article III standing to challenge Defendant Saesee's classification of Burleson as causally connected to the later assault.
3. Whether the complaint stated claims under the Rehabilitation Act and ADA based on allegedly inadequate mental-health care and failure to accommodate.
4. Whether the complaint stated claims under California Government Code section 845.6 for failure to summon immediate medical care.
5. Whether the complaint stated claims under the California Bane Act.
6. Whether the complaint stated negligence claims against the defendants.

HOLDINGS

1. The complaint did not plausibly allege deliberate indifference by Garces-Barrella, Oran, DeCarlo, or Turner because it did not show that their decisions exposed Cravotta to a substantial risk of serious harm or that Turner could reasonably have appreciated a specific threat from the cellmate.
2. The complaint failed to state Rehabilitation Act or ADA claims against the Regents because it did not allege that mental-health care was denied because of disability or that the alleged treatment amounted to a discriminatory refusal to accommodate.
3. The complaint failed to state section 845.6 claims against the individual Regent defendants or the Regents because it did not allege that they knew or had reason to know that Cravotta required immediate

medical care and failed to summon it.

4. The Bane Act claims against the Regent defendants were dismissed because the complaint failed to plead the underlying deliberate-indifference, ADA, Rehabilitation Act, or section 845.6 violations. The Bane Act claims against the County defendants and Saesee were not dismissed to the extent they were adequately supported by surviving deliberate-indifference allegations or unchallenged regulatory theories.
5. The negligence claims were sufficiently pleaded against defendants for whom deliberate-indifference allegations survived, including Rollon, Whiting, Blevins, Singh, Haynes, Higley, and Saesee, but were dismissed against Sturgis, Albright-Mundy, McLean, Paredes, Noda, and the Regents on the allegations presented.
6. Cravotta had standing to challenge Saesee's classification of Burleson because the complaint alleged a non-attenuated line of causation between the classification decision, Burleson's placement in general population, the cell assignment, and the assault.
7. The complaint plausibly alleged deliberate-indifference claims against Rollon, Whiting, Blevins, Singh, Haynes, Higley, and Saesee, but not against Sturgis, Albright-Mundy, Paredes, McLean, or Noda.

KEY QUOTATIONS

“The mere lack of due care by a state official does not deprive an individual of life, liberty, or property under the Fourteenth Amendment.” (Section I.B)

“The ADA prohibits discrimination because of disability, not inadequate treatment for disability.” (Section I.C)

“Liability under section 845.6 attaches only when an employee fails to summon medical care; failure to provide further treatment, or to ensure further diagnosis or treatment, is not actionable under section 845.6.” (Section I.D)

“The Court DENIES dismissal as to Plaintiff's remaining claims.” (Conclusion)

FACTUAL BACKGROUND

Anthony Cravotta II was a pretrial detainee at the Sacramento County Main Jail who had mental-health diagnoses and was housed in an outpatient psychiatric unit and later in general population housing. Jail officials allegedly assigned him to share a cell with Lemar Burleson despite records documenting Burleson's serious mental illness, assaultive behavior, threats toward cellmates, and hostility toward white people. Burleson assaulted Cravotta on September 26, 2021, causing catastrophic brain injuries; the court found that some allegations plausibly supported claims concerning the cell assignment and the post-assault medical response, while other allegations were insufficient.

PROCEDURAL HISTORY

Plaintiff filed the action on January 26, 2022. The court previously dismissed portions of the First Amended Complaint, dismissed one claim with prejudice, and granted leave to amend. Plaintiff filed the Third Amended Complaint on June 3, 2024. After a hearing on October 17, 2024, the court granted the motions to dismiss in

part, denied them in part, dismissed some claims with and some without leave to amend, and granted leave to file an amended complaint within 30 days.

DISPOSITION

other

CASES CITED

- Chandler v. State Farm Mutual Automobile Insurance Co., 598 F.3d 1115, 1121-22 (9th Cir. 2010)
- Spokeo, Inc. v. Robins, 578 U.S. 330, 338 (2016)
- Mendiondo v. Centinela Hospital Medical Center, 521 F.3d 1097, 1104 (9th Cir. 2008)
- Steinle v. City & County of San Francisco, 919 F.3d 1154, 1160 (9th Cir. 2019)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Foman v. Davis, 371 U.S. 178, 182 (1962)
- Eminence Capital, LLC v. Aspeon, Inc., 316 F.3d 1048, 1052 (9th Cir. 2003)
- Intri-Plex Technologies, Inc. v. Crest Group, Inc., 499 F.3d 1048, 1056 (9th Cir. 2007)
- Gibson v. County of Washoe, 290 F.3d 1175, 1187 (9th Cir. 2002)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1071, 1073, 1076 (9th Cir. 2016)
- Jett v. Penner, 439 F.3d 1091, 1096, 1099 (9th Cir. 2006)
- Gordon v. County of Orange, 888 F.3d 1118, 1124-25 (9th Cir. 2018)
- Gilbert v. Turner, 2024 WL 1947137, at *2 (9th Cir. May 3, 2024)
- Clouthier v. County of Contra Costa, 591 F.3d 1232, 1245 (9th Cir. 2010)
- Kodimer v. County of San Diego, 2010 WL 2635548, at *3-4 (S.D. Cal. June 30, 2010)
- Sisneros v. Kritzman, 2016 WL 11447608, at *4 (S.D. Cal. Feb. 9, 2016)
- O'Guinn v. Lovelock Correctional Center, 502 F.3d 1056, 1060 (9th Cir. 2007)
- Atayde v. Napa State Hospital, 255 F. Supp. 3d 978, 1001-02 (E.D. Cal. 2017)
- Simmons v. Navajo County, 609 F.3d 1011, 1022 (9th Cir. 2010)
- O'Guinn v. Nevada Department of Corrections, 468 Fed. App'x 651, 653 (9th Cir. 2012)
- Watson v. California, 21 Cal. App. 4th 836, 841 (1993)
- Horton v. City of Santa Maria, 915 F.3d 592, 608 (9th Cir. 2019)
- Resendiz v. County of Monterey, 2015 WL 7075694, at *8 (N.D. Cal. Nov. 13, 2015)
- Pajas v. County of Monterey, 2016 WL 3648686, at *12 (N.D. Cal. July 8, 2016)
- Bock v. County of Sutter, 2012 WL 3778953, at *17 (E.D. Cal. Aug. 31, 2012)
- Reese v. County of Sacramento, 888 F.3d 1030, 1040, 1043, 1045 (9th Cir. 2018)
- Venegas v. County of Los Angeles, 153 Cal. App. 4th 1230 (2007)
- Cornell v. City & County of San Francisco, 17 Cal. App. 5th 766, 803-04 (2017)
- Lapachet v. California Forensic Medical Group, Inc., 313 F. Supp. 3d 1183, 1195-96 (E.D. Cal. 2018)

- M.H. v. County of Alameda, 90 F. Supp. 3d 889, 898-99 (N.D. Cal. 2013)
- Scalia v. County of Kern, 308 F. Supp. 3d 1064, 1084 (E.D. Cal. 2018)
- Maya v. Centex Corp., 658 F.3d 1060, 1070 (9th Cir. 2011)
- Barnum Timber Co. v. EPA, 633 F.3d 894, 901 (9th Cir. 2011)
- Estate of Michael McCormack v. County of San Bernardino, 2023 WL 3407141, at *2-5 (C.D. Cal. Mar. 23, 2023)
- Christensen v. Georgia-Pacific Corp., 279 F.3d 807, 815-16 (9th Cir. 2002)
- Estate of Gonzales v. Hickman, 2006 WL 4959780, at *15 (C.D. Cal. Jan. 23, 2006)
- Lemire v. California Department of Corrections & Rehabilitation, 726 F.3d 1062, 1074, 1080-81 (9th Cir. 2013)
- Mendoza v. City of Los Angeles, 66 Cal. App. 4th 1333, 1339 (1998)
- Guy v. Bick, 2022 WL 1271374, at *3 (E.D. Cal. Apr. 27, 2022)
- Cotta v. County of Kings, 686 Fed. App'x 467, 469 (9th Cir. 2017)
- Edison v. United States, 822 F.3d 510, 521 (9th Cir. 2016)
- Giraldo v. California Department of Corrections & Rehabilitation, 168 Cal. App. 4th 231, 252-53 (2008)