

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Michael Reeves v. The County of Bergen, et al.

Reeves · No. Civil Action No. 18-14061 (BRM) (SDA) · Decided December 10, 2025

SUMMARY

The United States District Court for the District of New Jersey grants Bergen County's motions for summary judgment on the plaintiff's Monell, supervisory liability, and deliberate-indifference claims arising from medical care provided during immigration detention at Bergen County Jail. The court dismisses the remaining state-law claims without prejudice after declining supplemental jurisdiction and dismisses Morse Correctional Healthcare and Consulting, Inc.'s summary-judgment motion as moot.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Brian R. Martinotti
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	December 10, 2025
DOCKET	Civil Action No. 18-14061 (BRM) (SDA)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants Bergen County and Morse Correctional Healthcare and Consulting Inc. moved for summary judgment under Federal Rule of Civil Procedure 56. The court granted Bergen County's motion on the federal claims, declined supplemental jurisdiction over the remaining state-law claims, and dismissed Morse's motion as moot.
STANDARD OF REVIEW	Summary judgment is proper when the record shows no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court views facts and reasonable inferences in the light most favorable to the nonmoving party, but unsupported assertions, bare allegations, and speculation do not defeat summary judgment. Even when a nonmoving party fails to respond properly to a statement of material facts, the court must independently determine that summary judgment is warranted.
PRECEDENTIAL VALUE	unpublished and not for publication

TOPICS

section 1983 municipal liability summary judgment civil rights government liability

PRACTICE AREAS

civil rights prisoner and detainee medical care municipal liability federal civil procedure
supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether Bergen County could be held liable under 42 U.S.C. § 1983 under Monell for an alleged policy or custom of denying or inadequately providing medical care to immigration detainees.
2. Whether Reeves presented evidence that Bergen County acted with deliberate indifference by failing to train, supervise, hire, or discipline jail medical personnel.
3. Whether the court should exercise supplemental jurisdiction over the remaining New Jersey state-law claims after dismissing all federal claims.

HOLDINGS

1. A municipality is liable under § 1983 only when an official policy or custom is the moving force behind a constitutional injury. Reeves failed to identify evidence establishing that Bergen County promulgated or maintained a policy or custom of denying adequate medical care to immigration detainees.
2. Reeves did not produce evidence from which a reasonable factfinder could conclude that Bergen County was deliberately indifferent to a known or obvious risk of unconstitutional medical care, including through inadequate training or supervision.
3. After entering judgment on all claims over which it had original jurisdiction, the court declined to exercise supplemental jurisdiction over the remaining state-law claims and dismissed them without prejudice.

KEY QUOTATIONS

“A municipality or municipal agency may be held liable under § 1983 only if its official policy or custom causes a constitutional injury.” (III.A)

“As the Court will enter judgment in favor of Defendant Bergen County on Plaintiff’s federal claims, the Court declines supplemental jurisdiction over Plaintiff’s state law claims in Counts Three, Four, Five, and Six.” (III.B)

FACTUAL BACKGROUND

Reeves was taken into ICE custody after injuring his right shoulder and was detained at Bergen County Jail beginning June 25, 2018. After a second shoulder dislocation on June 29, he underwent a closed reduction and was instructed to remain in a sling; he later received physical-therapy prescriptions in October 2018. Reeves alleged that jail medical personnel denied or delayed care pursuant to a County policy or custom designed to

reduce medical costs for immigration detainees, but the court found that the record did not establish such a policy, custom, or deliberate indifference by Bergen County.

PROCEDURAL HISTORY

Reeves filed pro se complaints in 2018 concerning medical care received while detained at Bergen County Jail. After screening and several amendments, the operative fifth amended complaint asserted federal claims against Bergen County and state-law claims against Bergen County and Morse. The court resolved the parties' summary-judgment motions without oral argument, entering judgment for Bergen County on Counts One, Two, and Seven and dismissing the remaining state-law claims without prejudice.

DISPOSITION

other

CASES CITED

- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 247-48 (1986)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 323-24 (1986)
- *Matsushita Electric Industrial Co. v. Zenith Radio Corp.*, 475 U.S. 574, 586-87 (1986)
- *Ridgewood Board of Education v. N.E. ex rel. M.E.*, 172 F.3d 238, 252 (3d Cir. 1999)
- *Pennsylvania Coal Association v. Babbitt*, 63 F.3d 231, 236 (3d Cir. 1995)
- *Ruth v. Selective Insurance Co.*, No. 15-2616, 2017 WL 592146, at *2-3 (D.N.J. Feb. 14, 2017)
- *Anchorage Associates v. Virgin Islands Board of Tax Review*, 922 F.2d 168, 175 (3d Cir. 1990)
- *Beck v. City of Pittsburgh*, 89 F.3d 966, 971 (3d Cir. 1996)
- *Monell v. New York City Department of Social Services*, 436 U.S. 658, 694 (1978)
- *Hubbard v. Taylor*, 538 F.3d 229, 231 (3d Cir. 2008)
- *Bell v. Wolfish*, 441 U.S. 520, 535 (1979)
- *Thomas v. City of Harrisburg*, 88 F.4th 275, 281 (3d Cir. 2023)
- *Rouse v. Plantier*, 182 F.3d 192, 197 (3d Cir. 1999)
- *Chavarriaga v. New Jersey Department of Corrections*, 806 F.3d 210, 222-23 (3d Cir. 2015)
- *Rode v. Dellarciprete*, 845 F.2d 1195, 1207-08 (3d Cir. 1988)
- *Los Angeles County v. Humphries*, 562 U.S. 29, 35-36 (2010)
- *City of Canton v. Harris*, 489 U.S. 378, 389-90 (1989)
- *Natale v. Camden County Correctional Facility*, 318 F.3d 575, 583-84 (3d Cir. 2003)
- *Kneipp v. Tedder*, 95 F.3d 1199, 1212 (3d Cir. 1996)
- *Board of County Commissioners of Bryan County, Oklahoma v. Brown*, 520 U.S. 397, 404, 417-18 (1997)
- *Reitz v. County of Bucks*, 125 F.3d 139, 145 (3d Cir. 1997)
- *Brown v. Muhlenberg Township*, 269 F.3d 205, 215 (3d Cir. 2001)
- *Young v. Monmouth County*, No. 24-4975, 2025 WL 354447, at *3 (D.N.J. Jan. 31, 2025)

- *Hightower v. City of Philadelphia*, 130 F.4th 352, 357 (3d Cir. 2024)
- *Connick v. Thompson*, 563 U.S. 51, 61-63 (2011)
- *Schlaybach v. Berks Heim Nursing & Rehabilitation*, 839 F. App'x 759, 760 (3d Cir. 2021)
- *Estate of Roman v. City of Newark*, 914 F.3d 789, 798-800 (3d Cir. 2019)
- *Hedges v. Musco*, 204 F.3d 109, 123 (3d Cir. 2000)

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