

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

Robert Louis Brown v. Utah County Jail

Brown v. Utah County Jail · No. 2:24-cv-00200-DBB-CMR · Decided March 18, 2026

SUMMARY

The United States District Court for the District of Utah adopted the magistrate judge’s Report and Recommendation and granted Utah County Jail’s motion for judgment on the pleadings. The court held that Utah County Jail is not an independent legal entity capable of being sued under Utah law, dismissed the complaint without prejudice, and denied the remaining motions as moot while allowing 30 days to seek leave to amend.

CASE DETAILS

COURT	United States District Court for the District of Utah
WRITING FOR THE COURT	David Barlow
JURISDICTION	United States District Court for the District of Utah
DECIDED	March 18, 2026
DOCKET	2:24-cv-00200-DBB-CMR
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's Report and Recommendation recommending that Defendant's motion for judgment on the pleadings be granted. The district court reviewed the objections, adopted the Report, granted the motion in part, and dismissed the complaint without prejudice.
STANDARD OF REVIEW	De novo review of the portions of the magistrate judge's Report and Recommendation to which a timely and specific objection was made; issues not specifically objected to were not subject to de novo review.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order
PARTIES	Robert Louis Brown v. Utah County Jail

TOPICS

- motion for judgment on the pleadings
- civil procedure
- section 1983
- government liability
- municipal liability

PRACTICE AREAS

civil procedure

civil rights

government liability

municipal law

QUESTIONS PRESENTED

1. Whether Utah County Jail has the capacity to be sued under Utah law.
2. Whether Plaintiff's objection to the magistrate judge's Report and Recommendation warranted rejection of the recommendation.
3. Whether Plaintiff's Rule 60(b) motion could be used to challenge a nonfinal Report and Recommendation.

HOLDINGS

1. Utah County Jail, as a subdivision of Utah County, is not an independent legal entity capable of being sued under Utah law.
2. The objection did not warrant rejection of the Report and Recommendation because most objections were nonspecific and the single specific objection was unsupported by legal authority.
3. The Rule 60(b) motion was inapplicable because the Report and Recommendation was not a final judgment.

KEY QUOTATIONS

"must be both timely and specific." (at 1)

"The law of the state in which the district court sits governs the capacity of a governmental entity to sue or to be sued." (at 2)

"In Utah, a statute expressly provides that a county may sue or be sued, but there is no statutory or case authority supporting a direct action against a county's subdivisions, including its jails." (at 2)

"improperly name[d] Utah County Jail as a § 1983 defendant, when it is not an independent legal entity that can sue or be sued." (at 3)

FACTUAL BACKGROUND

Robert Louis Brown sued Utah County Jail under 42 U.S.C. § 1983. The complaint named the jail, rather than Utah County, as the sole defendant. Brown argued that Utah County Jail could be sued and relied on *Price v. Utah County Jail*, but the court concluded that Utah County Jail is not an independent legal entity capable of being sued.

PROCEDURAL HISTORY

Utah County Jail moved for judgment on the pleadings. The magistrate judge recommended granting the motion because Utah County Jail is a subdivision that lacks capacity to be sued under Utah law. Plaintiff filed an objection and a Rule 60(b) motion. The district court overruled the objection, adopted the Report and

Recommendation, dismissed the complaint without prejudice, denied other pending motions as moot, and allowed Plaintiff 30 days to seek leave to amend.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

None. If Plaintiff seeks leave to file an amended complaint, he must do so within 30 days.

CASES CITED

- United States v. 2121 E. 30th Street, 73 F.3d 1057, 1060 (10th Cir. 1996)
- White v. Utah, 5 F. App'x 852, 853 (10th Cir. 2001) (unpublished)
- Aston v. Cunningham, 216 F.3d 1086 n.3 (10th Cir. 2000) (unpublished)
- McDonald v. Davis Cnty., No. 120CV00136JNPDAO, 2021 WL 2940604, at *3 (D. Utah July 13, 2021)
- Price v. Utah Cnty. Jail, No. 2:24-CV-49-TS, 2025 WL 690351, at *1 (D. Utah Mar. 4, 2025)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF UTAH ROBERT LOUIS BROWN, ORDER ADOPTING [50] REPORT AND RECOMMENDATION AND GRANTING Plaintiff, [46] DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS v. Case No. 2:24-cv-00200-DBB-CMR UTAH COUNTY JAIL, District Judge David Barlow Defendant.

Before the court is pro se Plaintiff Robert Louis Brown's Objection¹ to the magistrate judge's Report and Recommendation ("Report").² On January 27, 2026, Defendant Utah County Jail filed a Motion for Judgment on the Pleadings.³ On March 13, 2026, the magistrate judge entered a Report recommending that the Motion be granted on the grounds that Utah County Jail is the sole defendant in the matter and is an entity that cannot be sued under Utah law.⁴ The magistrate judge also advised Mr. Brown of his right to object to the Report and Recommendation within 14 days of its service pursuant to 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b).⁵ Mr. Brown filed an Objection on March 16, 2026,⁶ and he filed a rule 60(b) motion opposing the Report the next day.⁷ In order to preserve an issue for de novo review in the district 1 Objection to Report and Recommendation ("Objection"), ECF No. 51, filed Mar.

16, 2026. 2 Report and Recommendation ("Report"), ECF No. 50, entered Mar. 13, 2026. 3 Motion for Judgment on the Pleadings ("MJP"), ECF No. 46, filed Jan. 27, 2026. 4 Id. at 3. 5 Id. 6 Objection. 7 Rule 60(b) Motion, ECF No. 52, filed Mar. 17, 2026. court, a party's objection to a magistrate judge's report and recommendation "must be both timely and specific."⁸ The majority of Mr. Brown's objections are not specific because they largely address issues that are irrelevant to the Report and are not in dispute.⁹ In his Objection, Mr. Brown requests a settlement conference,

argues that his 5th Amendment rights were violated, informs the court that a hospital visit prevented him from completing discovery, and takes issue with the fact that Defendant obtained additional counsel and cited to an unpublished case in its Motion.¹⁰ The Rule 60(b) motion, in addition to being inapplicable to the Report, which is not a final judgment,¹¹ repeats the same inapplicable arguments.¹² Mr. Brown does assert one relevant objection.

He argues that Defendant Utah County Jail can be sued and cites to the case *Price v. Utah County Jail* to support his claim.¹³ This argument is easily addressed. The Tenth Circuit has explained that “[t]he law of the state in which the district court sits governs the capacity of a governmental entity to sue or to be sued.”¹⁴ “In Utah, a statute expressly provides that a county may sue or be sued, but there is no statutory or case authority supporting a direct action against a county’s subdivisions, including its jails.”¹⁵ Thus, a county jail is not an entity that can be sued.¹⁶ The case Mr. Brown references, *Price v. Utah County Jail*, supports the magistrate judge’s reasoning.¹⁷ There, a pro se plaintiff attempted to sue 8 United States v. 2121 E. 30th Street, 73 F.3d 1057, 1060 (10th Cir.

1996). ⁹ See *id.* ¹⁰ Objection 1–3. ¹¹ See Fed. R. Civ. P. 60(b). ¹² Rule 60(b) Motion 1–2. ¹³ Objection 1. ¹⁴ *White v. Utah*, 5 F. App’x 852, 853 (10th Cir. 2001) (unpublished). ¹⁵ *Id.* (internal citations omitted). ¹⁶ *Id.*; see also *Aston v. Cunningham*, 216 F.3d 1086 n.3 (10th Cir. 2000) (unpublished) (“Mr. Aston named the Salt Lake County jail as a defendant.

Dismissal against this entity was also required because a detention facility is not a person or legally created entity capable of being sued.”); *McDonald v. Davis Cnty.*, No. 2021CV00136JNPDAO, 2021 WL 2940604, at *3 (D. Utah July 13, 2021). ¹⁷ *Price v. Utah Cnty. Jail*, No. 2:24-CV-49-TS, 2025 WL 690351, at *1 (D. Utah Mar. 4, 2025). sue Utah County Jail.* The judge who screened the complaint held that it was deficient because it “improperly name[d] Utah County Jail as a § 1983 defendant, when it is not an independent legal entity that can sue or be sued.”!?

Thus, Mr. Brown’s single specific objection is unsupported by any argument or legal authority. Having reviewed the Report, the court concludes that the magistrate judge’s analysis regarding Utah County Jail’s ability to be sued is legally correct. Plaintiff sued Utah County Jail, not Utah County.

Therefore, the court adopts the Report and Recommendation. ORDER Plaintiffs [51] Objection is OVERRULED. The [50] Report and Recommendation is ADOPTED, and Defendant’s [46] Motion for Judgment on the Pleadings is GRANTED IN PART. Plaintiffs [1] Complaint is DISMISSED WITHOUT PREJUDICE.

As a result, Defendant’s [11] Motion for Summary Judgment, Plaintiff’s [41] Motion for Judicial Settlement Conference, and Plaintiff’s [52] “Motion Rule 60b” are DENIED AS MOOT. The

Report and Recommendation at [40] is VACATED AS MOOT. If Plaintiff seeks leave to file an amended complaint, he must do so within 30 days. Signed March 18, 2026. BY THE COURT Qc DavidBarlow United States District Judge 18 Td.

9 Td.

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