

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

Michael Jayne v. County of Utah, et al.

Jayne · No. 2:25-cv-245-HCN · Decided March 31, 2026

SUMMARY

The United States District Court for the District of Utah denied Michael Jayne’s motions for preliminary injunctive relief, appointment of counsel, and class certification. The court concluded that some requested relief concerned past conduct or claims not alleged in the operative complaint, that certain claims implicated ongoing state criminal proceedings, and that Jayne had not shown a likelihood of success on his ADA, due process, confinement-conditions, medical-care, or access-to-mail claims.

CASE DETAILS

COURT	United States District Court for the District of Utah
WRITING FOR THE COURT	Howard C. Nielson, Jr.
JURISDICTION	United States District Court for the District of Utah
DECIDED	March 31, 2026
DOCKET	2:25-cv-245-HCN
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff in a civil-rights action arising from his detention and medical care at the Utah County Jail moved for preliminary injunctive relief, appointment of counsel, and class certification. The court denied the motions, denied several requests without prejudice, and granted a motion to dismiss Defendant Christine Rose Hinckley.
STANDARD OF REVIEW	A preliminary injunction requires the movant to establish likelihood of success on the merits, likely irreparable harm absent relief, a favorable balance of equities, and that an injunction is in the public interest. Each factor is a prerequisite. Requests for injunctive relief must be based on claims alleged in the operative complaint. Appointment of counsel in a civil case is discretionary, and class certification must be addressed at an early practicable time under Federal Rule of Civil Procedure 23(c)(1)(A).
PRECEDENTIAL VALUE	unknown
PARTIES	Michael Jayne v. County of Utah, et al.

TOPICS

injunctions

civil rights

ada / disability

due process

class actions

PRACTICE AREAS

civil rights

constitutional law

civil procedure

disability law

prisoner litigation

QUESTIONS PRESENTED

1. Whether Jayne was entitled to preliminary injunctive relief based on alleged excessive force and an alleged cover-up of past misconduct.
2. Whether the court could enjoin interference with Jayne's attorney-client communications and defense of pending state criminal proceedings.
3. Whether Jayne demonstrated a likelihood of success on his ADA discrimination and reasonable-accommodation claims.
4. Whether the alleged restrictions and disciplinary conditions violated pretrial-detainee due-process rights.
5. Whether Jayne demonstrated a likelihood of success on claims concerning conditions of confinement and deliberate indifference to medical needs.
6. Whether restrictions on access to the grievance kiosk and scanned mail justified preliminary injunctive relief.
7. Whether appointment or solicitation of counsel was warranted in the civil action.
8. Whether class certification was premature before screening, service, and responsive pleadings.
9. Whether Defendant Christine Rose Hinckley should be dismissed.

HOLDINGS

1. Past exposure to allegedly unlawful conduct does not support injunctive relief absent evidence of ongoing adverse effects, a sufficiently imminent and substantial risk of future harm, or likely recurrence. Jayne provided no verified representations or other evidence showing that excessive force or the alleged cover-up was likely to recur.
2. The federal court lacked jurisdiction, absent exceptional circumstances, to grant declaratory or injunctive relief interfering with pending state criminal proceedings, including alleged violations of Sixth Amendment rights.
3. Jayne did not demonstrate a likelihood of success on his ADA claims because he did not identify services, programs, or activities from which he was excluded or denied benefits by reason of disability, and he did not show that jail officials had notice of his alleged need for an elevated bed or toilet handlebars.
4. Jayne did not demonstrate a likelihood of success on his due-process claims concerning restrictions on tablets, books, showers, recreation, communication, law-library access, and solitary confinement. Conditions reasonably related to legitimate governmental objectives are not punishment without due process, and the record indicated that Jayne received procedural protections for the disciplinary incident.

5. Jayne did not demonstrate a likelihood of success on claims concerning dental treatment, solitary confinement, showers, reading materials, an orthopedic mattress, recreation, or other conditions because he did not show a deprivation of basic necessities or deliberate indifference to a serious health or safety risk.
6. Jayne did not demonstrate a likelihood of success on claims based on temporary restrictions on grievance-kiosk access or access to scanned mail. There is no independent constitutional right to state administrative grievance procedures, and mail restrictions are permissible when reasonably related to legitimate penological interests.
7. The court denied Jayne's motions for appointment of counsel without prejudice because civil litigants have no Sixth Amendment right to counsel, the court lacked authority to compel an unwilling attorney to represent him, and the claims and issues did not warrant requesting volunteer counsel at that time.
8. The motion for class certification was denied without prejudice as premature because the First Amended Complaint had not yet been screened, defendants had not been served or answered, and the case had not progressed sufficiently to determine whether any claims would proceed beyond the pleading stage.

KEY QUOTATIONS

“Such relief is “the exception rather than the rule” and will be granted only if “the movant’s right to relief [is] clear and unequivocal.”” (Section II)

“After all, “the purpose of preliminary relief is not to remedy past harm but to protect plaintiffs from irreparable injury that will surely result without its issuance.”” (Section II.A)

““[N]ot every disability imposed during pretrial detention amounts to ‘punishment’ in the constitutional sense.”” (Section II.C.2)

“The court concludes it is not yet practicable to resolve Mr. Jayne’s motion for class certification because his First Amended Complaint has not yet been screened” (Section IV)

FACTUAL BACKGROUND

Jayne was detained at the Utah County Jail and alleged that jail personnel subjected him to excessive force, inadequate dental and medical care, disability discrimination, restrictions on communication and recreation, solitary confinement, interference with legal materials and mail, and other unconstitutional conditions. He also alleged that jail personnel removed him from an allegedly ADA-compliant cell and restricted access to a tablet, books, showers, family visits, phone calls, the law library, and a kiosk. Several asserted injuries, including alleged cancellation of cancer follow-up care and some medical issues, were not pleaded in the operative complaint.

PROCEDURAL HISTORY

Jayne filed an original complaint and then a First Amended Complaint alleging constitutional and Americans with Disabilities Act violations by Utah County Jail deputies and University of Utah Hospital staff. He filed three motions for emergency preliminary injunction, several motions seeking counsel, and a motion for class certification. The court noted that the First Amended Complaint had not yet been screened under 28 U.S.C. §

1915(e)(2)(B), defendants had not been served, and no defendant had answered or moved to dismiss the amended complaint. The court denied the requested preliminary relief, denied appointment of counsel without prejudice, denied class certification without prejudice as premature, and granted dismissal of Christine Rose Hinckley.

DISPOSITION

other

CASES CITED

- Schiermeyer ex rel. Blockchain Game Partners, Inc. v. Thurston, 697 F. Supp. 3d 1265, 1269, 1271 (D. Utah 2023)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20, 22, 24 (2008)
- Aposhian v. Barr, 958 F.3d 969, 978 (10th Cir. 2020)
- Diné Citizens Against Ruining Our Environment v. Jewell, 839 F.3d 1276, 1281 (10th Cir. 2016)
- Village of Logan v. United States Department of Interior, 577 F. App'x 760, 766 (10th Cir. 2014) (unpublished)
- Eighth & Jackson Investment Group v. Kaw Valley Bank, 2013 WL 183753, at *4 (D. Kan. Jan. 17, 2013)
- TransUnion LLC v. Ramirez, 594 U.S. 413, 435 (2021)
- City of Los Angeles v. Lyons, 461 U.S. 95, 102–03 (1983)
- First Western Capital Management Co. v. Malamed, 874 F.3d 1136, 1141 (10th Cir. 2017)
- Phelps v. Hamilton, 122 F.3d 885, 889 (10th Cir. 1997)
- Sweeten v. Sneddon, 463 F.2d 713, 715 (10th Cir. 1972)
- Robertson v. Las Animas County Sheriff's Department, 500 F.3d 1185, 1193, 1197 (10th Cir. 2007)
- Rashad v. Doughty, 4 F. App'x 558, 560 (10th Cir. 2001) (unpublished)
- Bell v. Wolfish, 441 U.S. 520, 536–42 (1979)
- Wolff v. McDonnell, 418 U.S. 539, 541–42, 563–65 (1974)
- Lamb v. Norwood, 899 F.3d 1159, 1162 (10th Cir. 2018)
- DeSpain v. Uphoff, 264 F.3d 965, 971, 973–74 (10th Cir. 2001)
- Howard v. Dickerson, 34 F.3d 978, 980 (10th Cir. 1994)
- Boyd v. Werholtz, 443 F. App'x 331, 332 (10th Cir. 2011) (unpublished)
- Frazier v. Ortiz, 417 F. App'x 768, 773 (10th Cir. 2011) (unpublished)
- Johnson v. Johnson, 466 F.3d 1213, 1217 (10th Cir. 2006)
- McClelland v. Raemisch, No. 20-1390, 2021 U.S. App. LEXIS 29490, at *15 n.3 (10th Cir. Sept. 30, 2021) (unpublished)
- Steffey v. Orman, 461 F.3d 1218, 1223 (10th Cir. 2006)
- Rucks v. Boergermann, 57 F.3d 978, 979 (10th Cir. 1995)
- McCarthy v. Weinberg, 753 F.2d 836, 838–39 (10th Cir. 1985)

- Rachel v. Troutt, 820 F.3d 390, 397 n.7 (10th Cir. 2016)
- Mallard v. United States District Court for the Southern District of Iowa, 490 U.S. 296, 298 (1989)
- Greene v. United States Postal Service, 795 F. App'x 581, 583 (10th Cir. 2019) (unpublished)
- Gross v. GM LLC, 441 F. App'x 562, 567 (10th Cir. 2011) (unpublished)
- Castner v. Colorado Springs Cablevision, 979 F.2d 1417, 1421 (10th Cir. 1992)
- Perez v. Pinon Management, Inc., 2013 WL 792693, at *2 (D. Colo. Mar. 1, 2013)

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