

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jackson v. St. Andre

Jackson · No. 2:24-cv-2556 CKD P · Decided February 28, 2025

SUMMARY

The United States District Court for the Eastern District of California screened Julius C. Jackson’s amended prisoner civil-rights complaint under 28 U.S.C. § 1915A. The court found that he could proceed on an Eighth Amendment claim against defendants Martinez and Valdez, while claims concerning failure to protect and medical care were not actionable as pleaded. The court gave plaintiff 30 days to either proceed on the viable claim and voluntarily dismiss the other claims or seek leave to file a second amended complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Carolyn K. Delaney
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	February 28, 2025
DOCKET	2:24-cv-2556 CKD P
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se state-prisoner’s amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915A; the court must dismiss claims that are frivolous or malicious, fail to state a claim upon which relief may be granted, or seek monetary relief from an immune defendant.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court screening order
PARTIES	Julius C. Jackson v. Rob St. Andre, et al.

TOPICS

- section 1983
- prisoners rights
- civil procedure
- pleadings
- cruel and unusual punishment

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the amended complaint survived mandatory prisoner screening under 28 U.S.C. § 1915A.
2. Whether claim 1 stated a potentially actionable Eighth Amendment conditions-of-confinement claim.
3. Whether claim 2 adequately alleged deliberate indifference to a substantial risk of attack.
4. Whether claim 3 adequately alleged an Eighth Amendment medical-care claim.

HOLDINGS

1. Under 28 U.S.C. § 1915A, claims in a prisoner complaint must be dismissed if they are frivolous or malicious, fail to state a claim upon which relief may be granted, or seek monetary relief from an immune defendant.
2. Claim 1 may proceed at the screening stage because the court found it alleged a potentially actionable Eighth Amendment violation by defendants Martinez and Valdez.
3. Claim 2 was not actionable because plaintiff failed to allege facts showing that the named defendants were deliberately indifferent to specific information that plaintiff might be attacked.
4. Claim 3 was not actionable because plaintiff failed to allege an actionable injury caused by any defendant's conduct.

KEY QUOTATIONS

"The court must dismiss a complaint or portion thereof if the prisoner has raised claims that are legally 'frivolous or malicious,' that fail to state a claim upon which relief may be granted, or that seek monetary relief from a defendant who is immune from such relief." (1)

"Under the Eighth Amendment, prison officials have a duty to protect prisoners from harmful conditions of confinement." (2)

"Denial or delay of medical care can violate the Eighth Amendment." (2)

FACTUAL BACKGROUND

Plaintiff is a state prisoner proceeding without counsel and alleges constitutional violations by correctional and medical defendants. The court found that claim 1 plausibly alleged an Eighth Amendment violation against Martinez and Valdez. It found that claim 2 lacked facts showing deliberate indifference to specific information that plaintiff might be attacked, and that claim 3 failed to identify an actionable injury caused by deliberate indifference to serious medical needs.

PROCEDURAL HISTORY

Plaintiff filed an amended complaint seeking relief under 42 U.S.C. § 1983. On screening, the court found that claim 1 stated a potentially actionable Eighth Amendment claim against defendants Martinez and Valdez, while

claims 2 and 3 were deficient. The court gave plaintiff 30 days to elect either to proceed on claim 1 and voluntarily dismiss claims 2 and 3 or to seek leave to file a second amended complaint.

DISPOSITION

other

CASES CITED

- Farmer v. Brennan, 511 U.S. 825, 833-34, 837 (1994)
- Estelle v. Gamble, 429 U.S. 97, 104-05 (1976)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF
CALIFORNIA 10 11 JULIUS C. JACKSON, No. 2:24-cv-2556 CKD P 12 Plaintiff, 13 v. ORDER
14 ROB ST. ANDRE, et al., 15 Defendants. 16 17 Plaintiff is a state prisoner proceeding pro se
and seeking relief pursuant to 42 U.S.C. § 18 1983.

The court is required to screen complaints brought by prisoners seeking relief against a 19
governmental entity or officer or employee of a governmental entity. 28 U.S.C. § 1915A(a). The
20 court must dismiss a complaint or portion thereof if the prisoner has raised claims that are
legally 21 “frivolous or malicious,” that fail to state a claim upon which relief may be granted, or
that seek 22 monetary relief from a defendant who is immune from such relief.

28 U.S.C. § 1915A(b)(1),(2). 23 Plaintiff’s amended complaint (ECF No. 10) is before the court
for screening. 24 The court finds that plaintiff may proceed on claim 1 in his amended complaint
in which 25 he alleges violations of the Eighth Amendment by defendants Martinez and Valdez.
Claims 2 26 and 3 are not actionable. Plaintiff has two options: (1) proceed on claim 1 and
voluntarily 27 dismiss claims 2 and 3; or (2) seek leave to file a second amended complaint in an
attempt to cure 28 the deficiencies with respect to claims 2 and 3.] If plaintiff wishes to file a
second amended complaint, plaintiff is informed as follows: 2 1.

Under the Eighth Amendment, prison officials have a duty to protect prisoners from 3 | harmful
conditions of confinement. See Farmer v. Brennan, 511 U.S. 825, 833 (1994). A prison 4 || official
may be held liable for subjecting an inmate to harmful conditions of confinement if an 5 || inmate
suffers a sufficiently serious injury, and the prison official was deliberately indifferent to 6 || the
risk of harm.

Id. at 834, 837. The relevant inquiry is whether prison officials, “acting with 7 || deliberate
indifference, exposed a prisoner to a sufficiently substantial risk of serious damage to 8 | his future
health.” Id. at 834 (internal quotation omitted). With respect to claim 2, unlike his 9 || allegations

in claim 1, plaintiff fails to point to facts suggesting that the named defendants were at 10 || least deliberately indifferent to specific information that plaintiff might be attacked.

11 2. In claim 3, plaintiff complains about medical care. Denial or delay of medical care can 12 || violate the Eighth Amendment. *Estelle v. Gamble*, 429 U.S. 97, 104-05 (1976). A violation 13 || occurs when a prison official causes injury as a result of his or her deliberate indifference to a 14 || prisoner's serious medical needs. *Id.* In claim 3, plaintiff fails to any assert any actionable injury 15 || caused by any defendant's conduct.

16 Finally, plaintiff is informed that the court cannot refer to a prior pleading in order to 17 | make plaintiff's amended complaint complete. Local Rule 220 requires that an amended 18 || complaint be complete in itself without reference to any prior pleading. 19 In accordance with the above, IT IS HEREBY ORDERED that plaintiff is granted 30 days 20 || within which to complete and return the attached form notifying the court whether he wants to 21 || proceed on claim 1 in his amended complaint and voluntarily dismiss claims 2 and 3 or whether 22 || plaintiff wishes to file an amended complaint in an attempt to cure the deficiencies.

If plaintiff 23 || does not return the form, this action will proceed on claim 1 and the court will recommend that 24 || the other claims be dismissed. 25 | Dated: February 28, 2025 ☐☐ I / dle ae 26 CAROLYNK. DELANEY 27 UNITED STATES MAGISTRATE JUDGE 3g I/jack2556.option 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF CALIFORNIA 9 10 JULIUS C. JACKSON, No. 2:24-cv-2556 CKD P 11 Plaintiff, 12 v. PLAINTIFF'S NOTICE OF 13 ROB ST. ANDRE, et al., HOW TO PROCEED 14 Defendants.

15 16 Check one: 17 18 _____ Plaintiff wants to proceed immediately on claim 1 in his amended complaint and 19 voluntarily dismiss claims 2 and 3 OR 20 21 _____ Plaintiff wants time to file a second amended complaint. 22 DATED: 23 _____ 24 Plaintiff 25 26 27 28