

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PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court screening order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)

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