

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Robert D. Gibson v. T. Allen, et al.

Gibson · No. 25-cv-06834-WHO (PR) · Decided December 11, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed Robert D. Gibson’s 42 U.S.C. § 1983 complaint alleging that prison and correctional officials failed to protect him from attacks by other prisoners. The court held that the complaint did not allege specific facts establishing each defendant’s personal involvement, relied impermissibly on supervisory liability and state-law violations, and advanced speculative theories of deliberate indifference. The dismissal was without prejudice, and Gibson was granted leave to file a first amended complaint by February 2, 2026.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	William H. Orrick
JURISDICTION	United States District Court for the Northern District of California
DECIDED	December 11, 2025
DOCKET	25-cv-06834-WHO (PR)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights complaint reviewed during mandatory screening under 28 U.S.C. § 1915A(a).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must identify cognizable claims and dismiss claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. The court applied the Rule 12(b)(6)-type plausibility standard, accepting well-pleaded factual allegations as true and liberally construing the pro se pleading.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Robert D. Gibson v. T. Allen, et al.

TOPICS

- prisoners rights
- section 1983
- civil rights
- pleadings
- civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a cognizable Eighth Amendment failure-to-protect claim under 42 U.S.C. § 1983.
2. Whether the complaint sufficiently alleged each defendant's personal participation or causal connection to the alleged constitutional deprivation.
3. Whether supervisory officials could be held liable merely because of their supervisory positions.
4. Whether allegations that defendants violated state laws and regulations stated a federal claim under § 1983.

HOLDINGS

1. The complaint failed to state a claim because it did not plausibly allege that the defendants were deliberately indifferent to a substantial risk of serious harm or that their acts or omissions caused the April 6 attack.
2. A § 1983 complaint must allege specific facts tying each particular defendant to the specific constitutional wrong, including facts showing an act, participation, or legally required omission that caused the deprivation.
3. There is no respondeat superior liability under § 1983; a supervisor must have participated in or directed the violation, or known of the violation and failed to act to prevent it.
4. Alleged violations of state laws and regulations, without facts showing a violation of federal constitutional or statutory rights, do not state a claim under § 1983.

KEY QUOTATIONS

“The complaint fails to state any claim for relief.” (at 1)

“To be deliberately indifferent, the “official must both be aware of facts from which the inference could be drawn that a substantial risk of serious harm exists, and he must also draw the inference.”” (at 2)

“A person deprives another ‘of a constitutional right,’ within the meaning of section 1983, if he does an affirmative act, participates in another’s affirmative acts, or omits to perform an act which he is legally required to do that causes the deprivation of which [the plaintiff complains].” (at 3)

“There is no respondeat superior liability under § 1983.” (at 3)

FACTUAL BACKGROUND

Gibson alleged that he was attacked by one group of prisoners at Salinas Valley State Prison on April 5, 2024, and by a different group on April 6, 2024. He alleged that prison officials could have prevented the second attack by reviewing a recording of the first attack and identifying the earlier assailants. He named correctional officers and numerous supervisory officials, but did not allege individualized facts tying each defendant to a

constitutional violation; some defendants were unnamed, and other allegations concerning policy, surveillance, and housing status were speculative.

PROCEDURAL HISTORY

Gibson filed a 42 U.S.C. § 1983 complaint alleging that correctional and supervisory officials failed to protect him from attacks by other prisoners. On preliminary screening, the court concluded that the complaint failed to state a claim and dismissed it with leave to amend by February 2, 2026.

DISPOSITION

dismissed

CASES CITED

- *Balistreri v. Pacifica Police Department*, 901 F.2d 696, 699 (9th Cir. 1988)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 675-82, 678 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 556, 570 (2007)
- *Clegg v. Cult Awareness Network*, 18 F.3d 752, 754-55 (9th Cir. 1994)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Farmer v. Brennan*, 511 U.S. 825, 833-34 (1994)
- *Leer v. Murphy*, 844 F.2d 628, 633 (9th Cir. 1988)
- *Johnson v. Duffy*, 588 F.2d 740, 743 (9th Cir. 1978)
- *Keates v. Koile*, 883 F.3d 1228, 1241 (9th Cir. 2018)
- *Taylor v. List*, 880 F.2d 1040, 1045 (9th Cir. 1989)