

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Martin v. Knight

Martin · No. 1:22-cv-01582-ADA-BAM (PC) · Decided March 10, 2023

SUMMARY

The document contains findings and recommendations concerning screening of a state prisoner’s first amended complaint under 42 U.S.C. § 1983. The magistrate judge recommends allowing an Eighth Amendment deliberate-indifference claim against Correctional Officer Knight to proceed and dismissing the claims against Nurse Carranza and any other claims or defendants.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 10, 2023
DOCKET	1:22-cv-01582-ADA-BAM (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations on screening a state prisoner’s first amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The court screened the prisoner complaint under 28 U.S.C. § 1915A, accepting well-pleaded allegations as true and liberally construing them, while requiring facial plausibility under Federal Rule of Civil Procedure 8(a)(2) and Ashcroft v. Iqbal. For claims based on delay in medical treatment, the prisoner must allege that the delay caused harm.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Omar Martin v. Knight, Carranza

TOPICS

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

PRACTICE AREAS

- prisoner civil rights
- constitutional litigation
- Eighth Amendment medical care
- federal pleading and screening

QUESTIONS PRESENTED

1. Whether Martin stated an Eighth Amendment deliberate-indifference claim against Correctional Officer Knight based on delay or interference with emergency medical treatment.
2. Whether Martin stated an Eighth Amendment deliberate-indifference claim against Nurse Carranza based on the allegedly inadequate treatment and failure to order immediate off-site care.
3. Whether Martin stated an Eighth Amendment conditions-of-confinement claim based on leaking water and falling debris in his housing unit.
4. Whether Martin was entitled to declaratory relief.
5. Whether the deficiencies in the dismissed claims could be cured by further amendment.

HOLDINGS

1. Martin stated a cognizable Eighth Amendment claim against Knight because he alleged a serious medical need, Knight's knowledge of the obvious injury, refusal to summon emergency medical assistance, delay in treatment, and additional pain resulting from the delay.
2. Martin failed to state a cognizable deliberate-indifference claim against Carranza because the allegations showed, at most, negligence or a disagreement over the appropriate course of treatment.
3. Martin failed to state a conditions-of-confinement claim based on the leaking roof and falling debris.
4. Declaratory relief was unnecessary because a favorable verdict would itself establish whether Martin's constitutional rights were violated.

KEY QUOTATIONS

"A defendant does not act in a deliberately indifferent manner unless the defendant "knows of and disregards an excessive risk to inmate health or safety." (at 3)

"Medical malpractice does not become a constitutional violation merely because the victim is a prisoner." (at 5)

"Mere delay of medical treatment, without more, is insufficient to state a claim of deliberate medical indifference." (at 6)

FACTUAL BACKGROUND

Martin alleged that he was injured when he slipped on water and falling debris while hurriedly moving from his cell at California Substance Abuse and Treatment Facility. He alleged that Correctional Officer Knight knew of his immediate, severe, disfigured, and discolored hand injury, refused to summon emergency medical assistance, and ordered him to continue the move, causing several hours of additional pain before treatment. Martin alleged that Nurse Carranza examined him, provided pain medication and an ace bandage, but did not send him for immediate off-site emergency treatment; later examinations revealed two fractures requiring treatment and surgery.

PROCEDURAL HISTORY

Martin, a state prisoner proceeding pro se and in forma pauperis, brought a civil-rights action under 42 U.S.C. § 1983. After screening the original complaint, the court granted leave to amend. Martin filed a first amended complaint alleging that Correctional Officer Knight and Registered Nurse Carranza were deliberately indifferent to his serious medical needs and that prison conditions violated the Eighth Amendment. The magistrate judge recommended that the action proceed against Knight on one deliberate-indifference claim and that all other claims and defendants be dismissed without further leave to amend, subject to objections and review by the assigned district judge.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Doe I v. Wal-Mart Stores, Inc., 572 F.3d 677, 681 (9th Cir. 2009)
- Moss v. U.S. Secret Service, 572 F.3d 962, 969 (9th Cir. 2009)
- Jett v. Penner, 439 F.3d 1091, 1096 (9th Cir. 2006)
- Estelle v. Gamble, 429 U.S. 97, 104-106 (1976)
- Farmer v. Brennan, 511 U.S. 825, 834, 837 (1994)
- Simmons v. Navajo County, Ariz., 609 F.3d 1011, 1019 (9th Cir. 2010)
- Toguchi v. Chung, 391 F.3d 1051, 1060 (9th Cir. 2004)
- Broughton v. Cutter Laboratories, 622 F.2d 458, 460 (9th Cir. 1980)
- Anderson v. County of Kern, 45 F.3d 1310, 1314, 1316 (9th Cir. 1995)
- Wood v. Housewright, 900 F.2d 1332, 1334 (9th Cir. 1990)
- Snow v. McDaniel, 681 F.3d 978, 987-988 (9th Cir. 2012)
- Sanchez v. Vild, 891 F.2d 240, 242 (9th Cir. 1989)
- Peralta v. Dillard, 744 F.3d 1076, 1082-1083 (9th Cir. 2014)
- Wilhelm v. Rotman, 680 F.3d 1113, 1122-1123 (9th Cir. 2012)
- Jackson v. McIntosh, 90 F.3d 330, 332 (9th Cir. 1996)
- Lacey v. Maricopa County, 693 F.3d 896, 927 (9th Cir. 2012)
- Azadpour v. Sun Microsystems, Inc., No. 06-3272, 2007 WL 2141079, at *2 n.2 (N.D. Cal. July 23, 2007)
- McGuckin v. Smith, 974 F.2d 1050, 1059-1060 (9th Cir. 1992)
- Doty v. County of Lassen, 37 F.3d 540, 546 (9th Cir. 1994)
- Robinson v. Catlett, 725 F. Supp. 2d 1203, 1208 (S.D. Cal. July 19, 2010)
- Shapley v. Nevada Board of State Prison Commissioners, 766 F.2d 404, 407 (9th Cir. 1985)
- WMX Technologies, Inc. v. Miller, 104 F.3d 1133 (9th Cir. 1997)
- Wilson v. Seiter, 501 U.S. 294, 297-299, 304 (1991)

- Hallett v. Morgan, 296 F.3d 732, 744 (9th Cir. 2002)
- Frost v. Agnos, 152 F.3d 1124, 1128 (9th Cir. 1998)
- Johnson v. Lewis, 217 F.3d 726, 731-732 (9th Cir. 2000)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- Howard v. Adkison, 887 F.2d 134, 137 (8th Cir. 1989)
- Eccles v. Peoples Bank of Lakewood Village, 333 U.S. 426, 431 (1948)
- United States v. Washington, 759 F.2d 1353, 1357 (9th Cir. 1985)
- Lopez v. Smith, 203 F.3d 1122, 1130 (9th Cir. 2000)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)