

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Walker v. Adams

No. 24-cv-08901 EJD (PR) (N.D. Cal. May 22, 2025) · No. 24-cv-08901 EJD (PR) · Decided May 22, 2025

SUMMARY

The court screened a pro se 42 U.S.C. § 1983 complaint filed by a civil detainee concerning allegedly punitive housing conditions, disciplinary proceedings, medical care, retaliation, and mental health treatment. It allowed due process and deficient medical care claims against certain defendants to proceed, dismissed a duplicative housing claim and official-capacity damages claims, and dismissed other claims with leave to amend. The order required an amended complaint or notice concerning the deficient claims within 28 days.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Edward J. Davila
JURISDICTION	United States District Court for the Northern District of California
DECIDED	May 22, 2025
DOCKET	24-cv-08901 EJD (PR)
DISPOSITION	other
PROCEDURAL POSTURE	Pro se civil detainee brought an action under 42 U.S.C. § 1983 against county-jail officers and medical staff. The district court conducted screening under 28 U.S.C. § 1915A and ordered partial dismissal, with leave to amend as to deficient claims.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915A(a)-(b); 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. Pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Jeffery Walker v. Chief Adams, Captain Quantico, Lt. Rold, Captain Collins, Undersheriff Johnson, Sheriff Miyamoto, Deputy Gray, Lt. Willson, Sgt. Kutchens, Dr. Pratt, Dr. Main, Dr. Asa, Deputy Baker, Mary Doe, Jane Does 1-3

TOPICS

section 1983 procedural due process civil rights eleventh amendment immunity pleadings

PRACTICE AREAS

civil rights constitutional law prisoner and detainee litigation civil procedure remedies

QUESTIONS PRESENTED

1. Whether the complaint stated a cognizable Fourteenth Amendment due process claim based on punitive conditions imposed on a civil detainee.
2. Whether the due process claim against certain defendants was duplicative of a claim pending in another action.
3. Whether allegations of falsified disciplinary reports and sanctions stated a due process claim without allegations that the procedural protections required by *Wolff v. McDonnell* were denied.
4. Whether the plaintiff's PREA-related allegations stated a claim under § 1983.
5. Whether the allegations of retaliatory denial of medical care stated a First Amendment retaliation claim.
6. Whether claims for damages against defendants in their official capacities were barred by the Eleventh Amendment.
7. Whether the allegations of deficient medical care and denial of accommodations stated cognizable Fourteenth Amendment claims for a civil detainee.

HOLDINGS

1. A civil detainee awaiting adjudication may not be subjected to punitive conditions of confinement. The complaint stated a cognizable due process claim against Quantico and Rold because they allegedly knew of Walker's civil-detainee status and placed him in restrictive housing.
2. The due process claim concerning punitive housing conditions against Collins, Johnson, Miyamoto, and Adams was dismissed as duplicative because the same claim was proceeding in another pending action.
3. A civil detainee challenging disciplinary punishment must allege deprivation of the procedural protections required by *Wolff v. McDonnell*; allegations that disciplinary reports were falsified or that the detainee was innocent are insufficient by themselves.
4. The PREA does not create a private cause of action, and Walker's conclusory allegations concerning PREA confidentiality, support representation, and forensic examination were insufficient to state a § 1983 claim.
5. The allegations concerning denial of Lidocaine patches and ointment, denial of medical accommodations, and denial of medical assistance after falls were sufficient at the screening stage to state cognizable claims against Main, Asa, Baker, and medical Jane Does.
6. A retaliation claim was insufficiently pleaded because Walker did not allege facts establishing that the defendants knew of his grievances, that the alleged conduct chilled his First Amendment activity, or that the conduct did not reasonably advance a legitimate correctional goal.

7. The Eleventh Amendment bars Walker's claims for monetary relief against defendants in their official capacities.

KEY QUOTATIONS

“The Constitution demands due process, not error-free decision-making.” (at 5)

“Although the PREA did not create a private cause of action, failure to adhere to PREA reporting requirements may be used to support claims under other laws, including section 1983.” (at 6)

“However, Plaintiff’s due process claim against Defendants Quantico and Rold for subjecting him to punitive conditions of confinement at CJ3 in San Bruno and deficient medical care claim against Defendants Main, Asa, Baker, and medical “Jane Does” are cognizable.” (Conclusion ¶ 1)

FACTUAL BACKGROUND

Walker, a civil detainee awaiting a new probable-cause hearing under California's Sexually Violent Predator Act, was held at the San Francisco County Jail and transferred to another county jail in May 2024. He alleged that the receiving facility did not house civil detainees and that he was placed in punitive or restrictive conditions in retaliation for complaints and grievances. He also alleged disciplinary proceedings based on falsified reports, denial of medical and mental-health care, denial of medical accommodations, and injuries resulting from falls.

PROCEDURAL HISTORY

Walker filed the action after being transferred from the San Francisco County Jail in San Bruno, California, alleging punitive conditions of confinement, disciplinary-process violations, PREA-related misconduct, deficient medical and mental-health care, retaliation, and official-capacity claims. The court found cognizable a due process claim concerning punitive conditions against Quantico and Rold and deficient medical-care claims against Main, Asa, Baker, and medical Jane Does. Other claims were dismissed as duplicative, barred, or insufficiently pleaded, generally with leave to amend.

DISPOSITION

other

CASES CITED

- *Balistreri v. Pacifica Police Dep't*, 901 F.2d 696, 699 (9th Cir. 1988)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Jones v. Blanas*, 393 F.3d 918, 932-34 (9th Cir. 2004)
- *Cato v. United States*, 70 F.3d 1103, 1105 n.2 (9th Cir. 1995)
- *Wolff v. McDonnell*, 418 U.S. 539 (1974)
- *Mitchell v. Dupnik*, 75 F.3d 517, 523-26 (9th Cir. 1996)
- *Sandin v. Conner*, 515 U.S. 472 (1995)
- *Ricker v. Leapley*, 25 F.3d 1406, 1410 (8th Cir. 1994)

- McCrae v. Hankins, 720 F.2d 863, 868 (5th Cir. 1983)
- Rhodes v. Robinson, 408 F.3d 559, 567-68 (9th Cir. 2005)
- Pennhurst State Sch. & Hosp. v. Halderman, 465 U.S. 89, 98-100 (1984)
- Will v. Mich. Dep't of State Police, 491 U.S. 58, 71 (1989)
- Leer v. Murphy, 844 F.2d 628, 633-34 (9th Cir. 1988)
- Harris v. City of Roseburg, 664 F.2d 1121, 1125 (9th Cir. 1981)
- Ramirez v. Cty. of San Bernardino, 806 F.3d 1002, 1008 (9th Cir. 2015)
- Ferdik v. Bonzelet, 963 F.2d 1258, 1262 (9th Cir. 1992)

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