

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Grayson v. Lynch

Grayson v. Lynch · No. 2:24-cv-1488-JDP (P) · Decided May 12, 2025

SUMMARY

The court screens a state prisoner’s third amended complaint under 42 U.S.C. § 1983 alleging Eighth Amendment violations. It finds a cognizable conditions-of-confinement claim against defendant Vang based on prolonged exposure to extremely cold temperatures, but concludes that the remaining claims and allegations against Sergeant Nelson fail to state a claim. The court gives plaintiff thirty days to proceed on the cognizable claim or file a fourth amended complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	May 12, 2025
DOCKET	2:24-cv-1488-JDP (P)
DISPOSITION	other
PROCEDURAL POSTURE	Screening order in a pro se state-prisoner action under 42 U.S.C. § 1983.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e), the court screened the complaint to determine whether it was frivolous, malicious, failed to state a claim, or sought monetary relief from an immune defendant. The court applied the Rule 8(a)(2) plausibility standard, construing the pro se complaint liberally.
PRECEDENTIAL VALUE	Unpublished district-court screening order; precedential status unknown and no reporter citation appears.

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the third amended complaint stated a cognizable Eighth Amendment conditions-of-confinement claim against Vang based on prolonged exposure to extremely cold temperatures.
2. Whether the complaint stated an Eighth Amendment deliberate-indifference claim against Nelson when it did not allege Nelson's personal participation in the alleged wrongdoing.
3. Whether Vang's alleged failure to obtain an additional mental-health clinician stated an Eighth Amendment claim.
4. Whether the allegations supported an Eighth Amendment claim against Vang for placing Grayson in the outside holding cell when the complaint alleged that Diaz and Vazquez placed him there.

HOLDINGS

1. Yes. Grayson's allegations that Vang knowingly left him in prolonged freezing temperatures while aware that he was in pain and seeking help sufficiently alleged deprivation of adequate heating and deliberate indifference to a substantial risk of serious harm.
2. No. The complaint failed to state a claim against Nelson because it did not indicate that Nelson personally participated in any wrongdoing.
3. No. The allegations that Vang said he had called for a clinician, but that no clinician arrived, did not plausibly show that Vang failed to take reasonable steps to address a serious risk to Grayson's mental-health needs.
4. No. The complaint did not state a claim against Vang for placement in the holding cell because it alleged that Diaz and Vazquez, neither of whom was a named defendant, placed Grayson there.

KEY QUOTATIONS

"The Eighth Amendment guarantees adequate heating." (at 3)

"A prison official is deliberately indifferent if he knows that a prisoner faces a substantial risk of serious harm and disregards that risk by failing to take reasonable steps to abate it." (at 3)

"Plaintiff may either notify the court that he wishes to proceed only with his Eighth Amendment conditions of confinement claim against Vang, in which case I will direct service, or plaintiff may elect to amend his complaint." (at 5)

FACTUAL BACKGROUND

Grayson, a state prisoner, alleged that he reported suicidal ideations and was taken to a medical facility, but remained in an outside holding cell after delays in obtaining clinical evaluations. He alleged that the cell was exposed to bird feces and blood and that, after Vang relieved another officer, the temperature fell to approximately thirty to forty degrees, causing pain and an arthritis flare-up. Grayson claimed that Vang knew of his pain and pleas for help but ignored his welfare and left him in the cell overnight.

PROCEDURAL HISTORY

Grayson filed a third amended complaint alleging that correctional officers violated his Eighth Amendment rights by leaving him in an extremely cold holding cell, failing to obtain mental-health treatment, and placing him in the cell. The court screened the complaint and found one cognizable conditions-of-confinement claim against Vang, while concluding that the claims against Nelson and the remaining claims against Vang failed to state a claim. The court gave Grayson thirty days either to proceed solely on the cognizable claim or to file a fourth amended complaint, and directed that defendants not be served if he amended.

DISPOSITION

other

CASES CITED

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Kobold v. Good Samaritan Reg'l Med. Ctr., 832 F.3d 1024, 1038 (9th Cir. 2016)
- Nagrampa v. MailCoups, Inc., 469 F.3d 1257, 1264 n.2 (9th Cir. 2006) (en banc)
- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Hayes v. Idaho Corr. Ctr., 849 F.3d 1204, 1208 (9th Cir. 2017)
- Bruns v. Nat'l Credit Union Admin., 122 F.3d 1251, 1257 (9th Cir. 1997)
- Ivey v. Bd. of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Foster v. Runnels, 554 F.3d 807, 812 (9th Cir. 2009)
- Morgan v. Morgensen, 465 F.3d 1041, 1045 (9th Cir. 2006)
- Hudson v. Palmer, 468 U.S. 517, 526-27 (1984)
- Kennan v. Hall, 83 F.3d 1083, 1091 (9th Cir. 1996), amended on denial of reh'g, 135 F.3d 1318 (9th Cir. 1998)
- Farmer v. Brennan, 511 U.S. 825, 837 (1994)
- Lacey v. Maricopa Cnty., 693 F.3d 896, 907 n.1 (9th Cir. 2012) (en banc)