

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

James Curtis Rowley v. Mason County Sheriff's Department, et al.

Rowley · No. 3:25-cv-5030-RAJ · Decided January 13, 2026

SUMMARY

The United States District Court for the Western District of Washington adopts a magistrate judge’s Report and Recommendation and dismisses James Curtis Rowley’s amended complaint under Heck v. Humphrey and for failure to state a claim. The court denies leave to file a second amended complaint, concluding that further amendment would be futile because the alleged destruction-of-evidence and DNA-access claims remain noncognizable and other pleading deficiencies were not cured.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Richard A. Jones
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 13, 2026
DOCKET	3:25-cv-5030-RAJ
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed and adopted a magistrate judge's Report and Recommendation, dismissed Plaintiff's amended complaint under Heck v. Humphrey and for failure to state a claim, and denied leave to file a second amended complaint.
STANDARD OF REVIEW	The district court reviewed the Report and Recommendation, Plaintiff's objections, and the record; the order does not state a separate formal standard of review.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order
PARTIES	James Curtis Rowley v. Mason County Sheriff's Department, et al.

TOPICS

pleadings

section 1983

due process

prisoners rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the amended complaint was barred by *Heck v. Humphrey* and failed to state a claim upon which relief could be granted.
2. Whether Plaintiff should receive leave to file a second amended complaint after previously receiving leave and specific instructions but failing to cure the pleading deficiencies.
3. Whether the proposed amendments would be futile because they repeated noncognizable destruction-of-evidence and DNA-access theories and did not adequately allege municipal liability.

HOLDINGS

1. The amended complaint was dismissed pursuant to *Heck v. Humphrey* and for failure to state a claim upon which relief could be granted.
2. Leave to file a second amended complaint was denied because amendment would be futile and would merely reassert the same noncognizable claims.
3. Naming a proper defendant alone would not transform the complaint into a nonfrivolous pleading because Plaintiff still failed to allege facts showing that a county policy or custom was the moving force behind the alleged constitutional deprivation.

KEY QUOTATIONS

“However, the fact that Plaintiff does not challenge the validity of his conviction is precisely the reason that he is barred by the Heck doctrine from raising a § 1983 destruction-of-evidence claim.” (at 2)

“As such, this Court concludes that there is no possibility that Plaintiff’s pleading deficiencies may be cured through amendment” (at 4)

FACTUAL BACKGROUND

Rowley alleged that Defendants destroyed potentially exculpatory physical evidence and asserted related due-process, DNA-access, and destruction-of-evidence claims under § 1983. He had previously been given leave to amend and specific instructions to cure deficiencies, but his amended complaint repeated or failed to cure the fatal defects. His proposed second amended complaint would have relied on the same theories and authorities and would not have adequately alleged a county policy or custom causing the alleged constitutional deprivation.

PROCEDURAL HISTORY

Plaintiff filed a prisoner civil-rights action under 42 U.S.C. § 1983 and was previously granted leave to amend with specific instructions to cure pleading deficiencies. After Plaintiff filed an amended complaint, the magistrate judge recommended dismissal. Plaintiff objected and moved to file a second amended complaint, but the district court found that the proposed amendments would be futile, adopted the Report and Recommendation, dismissed the amended complaint, and denied further leave to amend.

DISPOSITION

dismissed

CASES CITED

- Heck v. Humphrey, 512 U.S. 477, 487 (1994)
- Swearington v. California Department of Corrections & Rehabilitation, 624 F. App'x 956, 959 (9th Cir. 2015)
- Arizona v. Youngblood, 488 U.S. 51 (1988)
- Reed v. Goertz, 598 U.S. 230 (2023)
- Gutierrez v. Saenz, 145 S. Ct. 2258 (2025)
- Oviatt v. Pearce, 954 F.2d 1470, 1474 (9th Cir. 1992)
- Neitzke v. Williams, 490 U.S. 319, 327 (1989)
- Lopez v. Smith, 203 F.3d 1122, 1130 (9th Cir. 2000)
- Akhtar v. Mesa, 698 F.3d 1202, 1212 (9th Cir. 2012)

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