

UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

Estate of Matthews v. City of Dearborn

No. 19-1592, United States Court of Appeals for the Sixth Circuit (September 14, 2020)

SUMMARY

The Sixth Circuit dismissed an interlocutory appeal from the denial of qualified immunity in a § 1983 excessive force case, holding that it lacked jurisdiction because the appeal was based on factual disputes rather than purely legal questions. The court emphasized that when a defendant challenges the district court's factual findings or credibility determinations—and does not concede the plaintiff's version of events or show that the record blatantly contradicts it—the appellate court cannot review the denial of qualified immunity. This case illustrates the limits of interlocutory jurisdiction over qualified immunity denials and the requirement that appeals must present legal, not factual, challenges.

CASE DETAILS

COURT	United States Court of Appeals for the Sixth Circuit
WRITING FOR THE COURT	Jane B. Stranch; Chad A. Readler; John J. Murphy
JURISDICTION	Federal
DECIDED	September 14, 2020
DOCKET	19-1592
DISPOSITION	dismissed
PROCEDURAL POSTURE	Interlocutory appeal from denial of qualified immunity in a § 1983 excessive force suit
PRECEDENTIAL VALUE	Unpublished
PARTIES	Chris Hampton, Police Officer v. Estate of Kevin Matthews, by Kim Matthews, Personal Representative

TOPICS

- civil procedure
- appellate jurisdiction
- qualified immunity
- fourth amendment
- civil rights

PRACTICE AREAS

- Civil Rights
- Appellate Procedure
- Government Liability

QUESTIONS PRESENTED

1. Whether the court has jurisdiction over the interlocutory appeal from the denial of qualified immunity
2. Whether the district court erred in denying qualified immunity

HOLDINGS

1. This court lacks jurisdiction over the interlocutory appeal because the appeal is based on factual disputes and not purely legal questions.

KEY QUOTATIONS

“given the safety mechanisms, which were functional at the time, it is 'doubtful' that the gun was loose in Hampton's holster.” (at 4)

“The opinions of these experts, based upon the physical evidence, is sufficient to cast doubt on Hampton's claim that Matthews was standing over him and trying to get his gun when the shooting occurred.” (at 5)

“what is at issue here are the facts themselves” (at 7)

“Hampton's legal arguments depend on factual disputes and credibility determinations” (at 7)

FACTUAL BACKGROUND

On December 23, 2015, Officer Hampton encountered Kevin Matthews, who had been accused of trying to steal a Red Bull and fled. Hampton chased Matthews into a backyard, over a fence, and during the struggle, Hampton shot and killed Matthews. The account of the struggle is disputed. Hampton claims Matthews grabbed his pepper spray and then reached for his gun, causing Hampton to fear for his life and shoot. Plaintiff's evidence, including expert testimony on bullet trajectories and lack of blood on Hampton, suggests the shooting could not have occurred as Hampton described. The district court found genuine issues of material fact.

PROCEDURAL HISTORY

The district court denied summary judgment to Officer Hampton on qualified immunity grounds, finding genuine issues of material fact. Hampton appealed.

DISPOSITION

dismissed

CASES CITED

- *Diluzio v. Village of Yorkville*, 796 F.3d 604 (6th Cir. 2015)
- *Adams v. Blount County, Tennessee*, 946 F.3d 940 (6th Cir. 2020)
- *Estate of Matthews v. City of Dearborn*, 2019 WL 1897154 (E.D. Mich. Apr. 29, 2019)
- *Mitchell v. Forsyth*, 472 U.S. 511 (1985)
- *Barry v. O'Grady*, 895 F.3d 440 (6th Cir. 2018)

- McGrew v. Duncan, 937 F.3d 664 (6th Cir. 2019)
- Johnson v. Jones, 515 U.S. 304 (1995)
- Phelps v. Coy, 286 F.3d 295 (6th Cir. 2002)
- Scott v. Harris, 550 U.S. 372 (2007)
- Ayala v. Hogsten, 786 F. App'x 590 (6th Cir. 2019)
- Coble v. City of White House, 634 F.3d 865 (6th Cir. 2011)
- Waters v. City of Morristown, 242 F.3d 353 (6th Cir. 2001)
- Harlow v. Fitzgerald, 457 U.S. 800 (1982)
- See v. City of Elyria, 502 F.3d 484 (6th Cir. 2007)
- Mullins v. Cyranek, 805 F.3d 760 (6th Cir. 2015)
- Franklin for Estate of Franklin v. Peterson, 878 F.3d 631 (8th Cir. 2017)
- Thomas v. City of Columbus, 854 F.3d 361 (6th Cir. 2017)
- Tennessee v. Garner, 471 U.S. 1 (1985)
- Burnette v. Gee, 137 F. App'x 806 (6th Cir. 2005)
- Romo v. Lagen, 723 F.3d 670 (6th Cir. 2013)
- Sevy v. Barach, 815 F. App'x 58 (6th Cir. 2020)