

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Lydon McCann-McCalpine v. Director Gail Watts

McCann-McCalpine v. Watts · No. BAH-23-2039 · Decided February 24, 2026

SUMMARY

The United States District Court for the District of Maryland granted Defendant Director Gail Watts’s motion for judgment on the pleadings in a 42 U.S.C. § 1983 action arising from the plaintiff’s arrest and detention at the Baltimore County Detention Center. The court held that the plaintiff failed to adequately allege Watts’s personal participation, supervisory liability, or deliberate indifference under the Fourteenth Amendment. The court dismissed the case and declined to reach qualified immunity.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Brendan A. Hurson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	February 24, 2026
DOCKET	BAH-23-2039
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c) in a 42 U.S.C. § 1983 action. The court granted the motion and dismissed the case.
STANDARD OF REVIEW	A Rule 12(c) motion is decided under the same standard as a Rule 12(b)(6) motion. The court disregards legal conclusions, accepts well-pleaded factual allegations as true, draws reasonable inferences for the plaintiff, and asks whether the complaint states a facially plausible claim for relief.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court memorandum opinion

TOPICS

- motions to dismiss
- section 1983
- prisoners rights
- due process
- cruel and unusual punishment

PRACTICE AREAS

- civil rights
- constitutional law
- prisoner civil rights
- federal civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff's complaint stated a constitutional claim against Director Watts based on alleged deliberate indifference to risks arising from the inmate attack, housing placement, unknown substance in his food, or canceled family visits.
2. Whether Plaintiff adequately pleaded supervisory liability under 42 U.S.C. § 1983.
3. Whether Defendant was entitled to judgment on the pleadings under Federal Rule of Civil Procedure 12(c).

HOLDINGS

1. A pretrial detainee may state a Fourteenth Amendment claim based on an objectively unreasonable official action or failure to act in the face of an unjustifiably high risk of harm, but Plaintiff failed to plead that Watts knew or should have known of the relevant risks or medical recommendation and therefore failed to state a claim against her.
2. Respondeat superior does not generally impose liability under § 1983, and a supervisor may be liable only when the supervisor's own deliberate indifference or tacit authorization caused the constitutional injury. Plaintiff failed to plead the required knowledge, inadequate response, and causal link.
3. Judgment on the pleadings was appropriate because Plaintiff's allegations, accepted as true and construed in his favor, did not state a plausible constitutional claim against Watts.

KEY QUOTATIONS

“Now, it is sufficient that the plaintiff show that the defendant’s action or inaction was, in Kingsley’s words, ‘objectively unreasonable,’” (III)

“A supervisory official cannot be held liable for the acts of a subordinate unless the supervisor’s “indifference or tacit authorization of subordinates’ misconduct” can be deemed to have caused the injury to the plaintiff.” (III)

“Plaintiff has not provided sufficient information to allow his claims against Defendant Watts to proceed.” (IV)

FACTUAL BACKGROUND

Plaintiff was a pretrial detainee at the Baltimore County Detention Center when he was attacked by several inmates on April 25, 2021, requiring hospitalization and staples. He alleged that Director Watts failed to investigate or report the attack, failed to ensure his placement in a safer housing area, failed to investigate an unknown substance found in his food, and failed to correct canceled family visits. The court found that Plaintiff did not allege facts showing Watts knew of the relevant risks or personally participated in the alleged constitutional violations.

PROCEDURAL HISTORY

Plaintiff initially sued multiple Baltimore County Police Department and Baltimore County Detention Center-related defendants concerning his arrest, detention, alleged assault, an object found in his food, and visitation

issues. The court dismissed the claims against the other defendants in whole or in part, leaving claims against Director Gail Watts. Plaintiff's appeal from the earlier dismissal order was dismissed by the Fourth Circuit for lack of jurisdiction. After Watts answered, she moved for judgment on the pleadings; the court granted the motion after permitting Plaintiff to supplement his opposition.

DISPOSITION

dismissed

CASES CITED

- Bierman Fam. Farm, LLC v. United Farm Fam. Ins. Co., 265 F. Supp. 3d 633, 637 n.5 (D. Md. 2017)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Nemet Chevrolet, Ltd. v. Consumeraffairs.com, Inc., 591 F.3d 250, 253 (4th Cir. 2009)
- Swaso v. Onslow Cnty. Bd. of Educ., 698 F. App'x 745, 747 (4th Cir. 2017)
- Owens v. Balt. City State's Att'ys Off., 767 F.3d 379, 396 (4th Cir. 2014)
- Gregg v. Georgia, 428 U.S. 153, 173 (1976)
- Estelle v. Gamble, 429 U.S. 97, 102–03 (1976)
- King v. Rubenstein, 825 F.3d 206, 218 (4th Cir. 2016)
- Williams v. Benjamin, 77 F.3d 756, 761 (4th Cir. 1996)
- Thompson v. Virginia, 878 F.3d 89, 97 (4th Cir. 2017)
- Whitley v. Albers, 475 U.S. 312, 319–20 (1986)
- Short v. Hartman, 87 F.4th 593, 604–05, 608–12 (4th Cir. 2023)
- Kingsley v. Hendrickson, 576 U.S. 389, 398 (2015)
- Farmer v. Brennan, 511 U.S. 825, 834 (1994)
- Wilson v. Seiter, 501 U.S. 294, 303 (1991)
- Wright v. Collins, 766 F.2d 841, 850 (4th Cir. 1985)
- Love-Lane v. Martin, 355 F.3d 766, 782 (4th Cir. 2004)
- Baynard v. Malone, 268 F.3d 228, 235 (4th Cir. 2001)
- Slakan v. Porter, 737 F.2d 368, 372 (4th Cir. 1984)
- Shaw v. Stroud, 13 F.3d 791, 799 (4th Cir. 1994)
- Wellington v. Daniels, 717 F.2d 932, 936 (4th Cir. 1983)