

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Melvin Jaman Peete v. Patrick Covelo

No. 2:24-cv-03440 WBS SCR P (E.D. Cal. Dec. 1, 2025) · No. 2:24-cv-03440 WBS SCR P · Decided December 1, 2025

SUMMARY

The United States District Court for the Eastern District of California screened Melvin Jaman Peete’s 42 U.S.C. § 1983 complaint against Mule Creek State Prison Warden Patrick Covelo. The court granted in forma pauperis status but found that the complaint failed to state a cognizable Eighth Amendment claim because it did not link Covelo to the alleged inadequate medical care or confinement conditions. The court declined to serve the complaint and granted plaintiff 30 days to file an amended complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 1, 2025
DOCKET	2:24-cv-03440 WBS SCR P
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights complaint screened under 28 U.S.C. § 1915A before service; the court granted in forma pauperis status, found no cognizable claim, and granted leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss a prisoner complaint that is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. For failure to state a claim, the allegations are accepted as true and construed in the light most favorable to the plaintiff, but the complaint must contain sufficient factual matter to state a facially plausible claim.
PRECEDENTIAL VALUE	Nonprecedential district-court screening order
PARTIES	Melvin Jaman Peete v. Patrick Covelo

TOPICS

prisoners rights

section 1983

cruel and unusual punishment

pleadings

civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional litigation

federal civil procedure

prison medical care

QUESTIONS PRESENTED

1. Whether the complaint stated an Eighth Amendment deliberate-indifference claim against the warden under 42 U.S.C. § 1983.
2. Whether the complaint stated an Eighth Amendment conditions-of-confinement claim against the warden.
3. Whether the request for injunctive relief concerning conditions at Mule Creek State Prison remained viable after Peete was transferred to another facility.
4. Whether damages claims against the warden in his official capacity were barred by Eleventh Amendment immunity.
5. Whether Peete should be granted leave to amend after the complaint failed statutory screening.

HOLDINGS

1. The complaint failed to state a cognizable deliberate-indifference claim because it did not allege facts showing that Covelo had subjective knowledge of Peete's medical condition or personally participated in, caused, or was linked to the alleged inadequate medical care.
2. The allegations that Peete received medication and fluids and was sent to quarantine amounted, at most, to negligence or a disagreement over the appropriate treatment, which is insufficient to establish deliberate indifference.
3. The complaint did not adequately state a valid Eighth Amendment claim against Covelo because it did not identify the warden's involvement in the allegedly unsanitary or inadequate quarantine-cell conditions.
4. To the extent Peete sought damages from Covelo in his official capacity, those claims were barred by Eleventh Amendment immunity.
5. Peete was granted 30 days to file an amended complaint that identifies each defendant's involvement and states facts supporting a claim under § 1983.

KEY QUOTATIONS

"In order to avoid dismissal for failure to state a claim a complaint must contain more than "naked assertions," "labels and conclusions" or "a formulaic recitation of the elements of a cause of action." (at 2)

"The second prong is satisfied by showing (a) a purposeful act or failure to respond to a prisoner's pain or possible medical need and (b) harm caused by the indifference." (at 6)

"A difference of opinion about the proper course of treatment is not deliberate indifference, nor does a dispute between a prisoner and prison officials over the necessity for or extent of medical treatment amount to

a constitutional violation.” (at 7)

“Plaintiff’s complaint fails to state a claim upon which relief may be granted, see 28 U.S.C. § 1915A, and will not be served.” (at 10)

FACTUAL BACKGROUND

Peete alleged that, while incarcerated at Mule Creek State Prison, he became ill with influenza, fainted while waiting for medical staff, and remained on the floor for approximately 30 to 45 minutes. He alleged that he was known to be medically high-risk and immunosuppressed, but was treated at the medical unit rather than sent to a hospital, then placed in a dirty quarantine cell without bedding, a mattress, a cane, clean clothing, or a shower for three days. He sued Warden Patrick Covelo, although he did not allege that Covelo personally participated in or knew about the alleged medical-care deficiencies.

PROCEDURAL HISTORY

Peete, a state prisoner proceeding pro se, filed a 42 U.S.C. § 1983 complaint against MCSP Warden Patrick Covelo alleging inadequate medical care and unconstitutional conditions of confinement. The court granted leave to proceed in forma pauperis and conducted the required screening. It concluded that the complaint did not state a cognizable Eighth Amendment claim against Covelo, ordered that the complaint not be served, and allowed Peete 30 days to file an amended complaint.

DISPOSITION

other

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 325, 327 (1989)
- Jackson v. Arizona, 885 F.2d 639, 640 (9th Cir. 1989)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-57, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Erickson v. Pardus, 551 U.S. 89, 93-94 (2007)
- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Estelle v. Gamble, 429 U.S. 97, 104-06 (1976)
- Jett v. Penner, 439 F.3d 1091, 1096 (9th Cir. 2006)
- Hallett v. Morgan, 296 F.3d 732, 744 (9th Cir. 2002)
- Lopez v. Smith, 203 F.3d 1122, 1131-32 (9th Cir. 2000)
- McGuckin v. Smith, 974 F.2d 1050, 1059-60 (9th Cir. 1992)
- WMX Technologies, Inc. v. Miller, 104 F.3d 1133 (9th Cir. 1997) (en banc)
- Farmer v. Brennan, 511 U.S. 825, 834, 837, 839 (1994)
- Frost v. Agnos, 152 F.3d 1124, 1130 (9th Cir. 1998)
- Hamby v. Hammond, 821 F.3d 1085, 1092 (9th Cir. 2016)

- *Toguchi v. Chung*, 391 F.3d 1051, 1058 (9th Cir. 2004)
- *Sanchez v. Vild*, 891 F.2d 240, 242 (9th Cir. 1989)
- *Monell v. Department of Social Services*, 436 U.S. 658, 691-92 (1978)
- *May v. Enomoto*, 633 F.2d 164, 167 (9th Cir. 1980)
- *Wood v. Housewright*, 900 F.2d 1332, 1334 (9th Cir. 1990)
- *Tiedemann v. von Blanckensee*, 72 F.4th 1001, 1008 (9th Cir. 2023)
- *Garcia v. Adams*, No. 1:06-CV-0360 OWW DLB PC, 2007 WL 2492683, at *1 n.1 (E.D. Cal. Aug. 30, 2007)
- *Flint v. Dennison*, 488 F.3d 816, 825 (9th Cir. 2007)
- *Anderson v. County of Kern*, 45 F.3d 1310, 1314 (9th Cir. 1995)
- *Cockcroft v. Kirkland*, 548 F. Supp. 2d 767, 775 (N.D. Cal. 2008)
- *Hoptowit v. Ray*, 682 F.2d 1237, 1259 (9th Cir. 1982)
- *Rizzo v. Goode*, 423 U.S. 362, 370-71 (1976)
- *Arnold v. International Business Machines Corp.*, 637 F.2d 1350, 1355 (9th Cir. 1981)
- *Johnson v. Duffy*, 588 F.2d 740, 743 (9th Cir. 1978)
- *Ivey v. Board of Regents*, 673 F.2d 266, 268 (9th Cir. 1982)
- *Loux v. Rhay*, 375 F.2d 55, 57 (9th Cir. 1967)
- *Lacey v. Maricopa County*, 693 F.3d 896, 928 (9th Cir. 2012) (en banc)