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Rawson v. Recovery Innovations, Inc.

United States Court of Appeals, Ninth Circuit - September 9, 2020 - F.3d - 2020 WL 5405684 - 20 Cal. Daily Op. Serv. 9512 - 2020 Daily Journal D.A.R. 9819

Patient who was involuntarily committed at private hospital brought § 1983 action against operator of the hospital, hospital employee, and others, alleging that he was wrongfully detained, and forcibly injected with antipsychotic medications in order to support his involuntary commitment, in violation of his Fourth and Fourteenth Amendment rights.

The United States District Court granted summary judgment, in part, in favor of defendants. Patient appealed.

The Court of Appeals held that hospital operator and employees acted under color of state law, as required to support liability in patient's § 1983 due process claim.

Operator of private hospital and private hospital employees acted "under color of state law" in allegedly continuing patient's involuntary commitment for mental health treatment and forcibly medicating him, as required to support operator's and employees' liability in patient's § 1983 due process claim; patient was committed pursuant to Washington's Involuntary Treatment Act, state's imprimatur was necessary to continue patient's detention, state relied on hospital staff's professional judgment to fulfill its constitutional obligations toward those it ordered involuntarily committed, employees communicated extensively with prosecutor regarding patient's treatment and medical diagnosis in preparing involuntary commitment case, and operator leased private hospital premises from state.