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State v. Young

Supreme Court of Maryland - June 23, 2026 - A.3d - 2026 WL 1801178

Prison inmate filed suit against prison tier officer, warden and State, asserting claims under Maryland Tort Claims Act (MTCA) and *Prince George's County v. Longtin*, 419 Md. 450, 19 A.3d 859, that authorized suits against county and local governments for pattern or practice of engaging in or allowing unconstitutional conduct by government employees, arising out of acts by officer and warden that allegedly facilitated separate assaults by other prisoners.

Following jury trial, the Circuit Court entered judgment on jury's verdict in inmate's favor and against officer, warden and State, and denied defendants' post-trial motions for judgment notwithstanding verdict (JNOV), or, in alternative, for reduction in judgment against State, but reduced $1 million verdicts against officer and warden.

State appealed. The Appellate Court affirmed in part, and reversed in part. State's petition for writ of certiorari was granted.

The Supreme Court held that:

- Tier officer and warden were immune from liability for injuries sustained by inmate, and only State remained liable, under MTCA;
- Jury's verdict did not establish necessary predicate findings for trial court to find that multiple incidents or occurrences of negligence, thus capping State's liability at $400,000 for single incident or occurrence, under MTCA;
- State was not judicially estopped from arguing that more questions should have been presented to jury as to number of incidents of negligence, in order to support findings of multiple acts of negligence, for purposes of State's waiver of sovereign immunity under MTCA;
- Inmate, and not State, bore burden of proving multiple incidents or occurrences of negligence by officer and warden that caused inmate's injuries, for purposes of State's waiver of sovereign immunity under MTCA;
- Trial court did not have authority to make posttrial findings that there were multiple occurrences or incidents of negligence, for purposes of State's waiver of sovereign immunity under MTCA;
- State's claim that holding in *Longtin*, 419 Md. 450, 19 A.3d 859, that plaintiff may bring claim against county or local government for pattern or practice of engaging in or allowing unconstitutional conduct by government employees did not apply to State was moot;
- Claim that *Longtin*, 419 Md. 450, 19 A.3d 859, did not apply to State did not come within "public interest" exception to mootness doctrine; and
- Portion of Appellate Court's conclusion on threshold issue of first impression that *Longtin* applied to State was unnecessary to inmate's *Longtin* claim, thus warranting vacatur of that conclusion.

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