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Castro v. County of Los Angeles

United States Court of Appeals, Ninth Circuit - May 1, 2015 - F.3d - 15 Cal. Daily Op. Serv. 4248

Arrestee brought action against county, sheriff's department, and two officers under § 1983 for violation of the Fourth Amendment right to be protected from harm by other inmates, arising out of attack against by another arrestee with whom he was jailed. A jury returned a verdict for arrestee, and the District Court denied defendants' motion for judgment as a matter of law. Defendants appealed.

The Court of Appeals held that:

- Right of inmates to be protected from attacks by other inmates was established with sufficient clarity to guide a reasonable officer;
- Substantial evidence supported jury's determination that officer was deliberately indifferent to a substantial risk of serious harm to arrestee;
- Sufficient evidence supported jury's determination that officer's deliberate indifference was actual and proximate cause of harm to arrestee;
- Sufficient evidence supported jury's determination that supervising officer was aware of, but disregarded, risk to arrestee posed by other inmate;
- Design of a jail by municipality is the result of a series of deliberate choices that render the design a formal municipal policy for the purposes of municipal liability under § 1983;
- Arrestee failed to establish that county had actual knowledge of risk of harm from design of jail, as required to establish liability under § 1983; and
- Award of future damages to arrestee was supported by the record.