
IMMUNITY - CALIFORNIA

Williamson v. City of National City

United States Court of Appeals, Ninth Circuit - January 24, 2022 - F.4th - 2022 WL 201071 - 22 Cal. Daily Op. Serv. 1133 - 2022 Daily Journal D.A.R. 842

Protester brought § 1983 action against police officers alleging Fourth Amendment excessive force claims, along with claims under California's Tom Bane Civil Rights Act, arising from her removal, in handcuffs, from city council meeting at which she and other protesters performed a "die-in" demonstration with red-painted hands and chanting following death of a suspect in custody.

The United States District Court for the Southern District of California denied officers' motion for summary judgment based on qualified immunity. Officers appealed.

The Court of Appeals, Forrest held that:

- Type and amount of force used in pulling protester backward out of meeting by her arms and wrists after she went limp was minimal;
- City's interests in forcibly removing protester from meeting were low but not nonexistent;
- Gravity of intrusion on protester and weight of city's interests in removing her were aligned; and
- Bane Act claim failed for lack of proof of underlying constitutional violation.

Copyright © 2026 Bond Case Briefs | bondcasebriefs.com