Jails: Guard, Detention Center and County are Not Liable in Death of Inmate Due to Methadone Toxicity

Laganiere v. County of Olmstead, No. 14-1088 (8th Cir. Nov. 24, 2014)

The Eighth Circuit has upheld a Minnesota District Court holding that a guard, detention center and county are not liable in the death of an inmate who succumbed to methadone toxicity, finding no "policy or custom" of negligent oversight nor any "deliberate indifferenece"to the inmate's plight.

When Cody Laganiere was prescribed methadone September 17, 2010 as an inmate of the Olmstead County Adult Detention Center in Minneapolis. A neighboring inmate noticed that when Laganiere took the medication he drooled and slurred. He asked a detention officer to check on Laganiere.

On September 24, 2010 officer Muaseth was assigned to check on the inmate every thirty minutes that day. She noticed that Laganiere did not appear for morning headcount or leave his cell for breakfast. The officer asked him if he would like to come to breakfast and he replied he did not. At 10:10 am Mauseth found Laganiere asleep in his cell and heard him snoring. At 10:35 am, the next check in, Mauseth saw him sleeping in the same position and called out to him. Laganiere did not respond. Mauseth shook him, to no effect. Officers tried to revive Laganiere, but he remained unresponsive and was ultimately pronounced dead. The immediate cause was methadone toxicity.

The trustee of Laganiere's estate filed suit against Olmstead County Adult Detention Center, Olmstead County, Mauseth, and Mauseth's supervisor alleging deliberate indifference to Laganiere's medical needs. The District Court granted summary judgment to the County and detention center, holding that the plaintiff failed to demonstrate that a "policy or custom" caused Laganiere's death. It granted the same relief to the Mauseth's supervisor, having found that there was no evidence presented regarding the training and supervision of detention officers. Mauseth was also awarded summary judgment since the record did not demonstrate she was deliberately indifferent to Laganiere's medical needs.

HELD: The Eighth Circuit affirmed the District Court on all three grants of summary judgment.

DISCUSSION: The court first assessed the trustee's allegation that Mauseth knew Laganiere suffered serious side effects from the methadone medication but deliberately disregarded that fact: a "plaintiff claiming deliberate indifference must show an objectively serious medical need, and that the defendant actually knew of, but deliberately disregarded, such need." It pointed out that deliberate disregard requires "more than negligence, more even than gross negligence, but less than purposefully causing or knowingly bringing about a substantial risk of serious harm to the inmate." Under this standard, Mauseth was not culpable. The neighboring inmate had told jail *staff* of Laganiere's medical condition, but *not* Mauseth specifically. Moreover, Mauseth was not present when Laganiere drooled or slurred, nor was she in contact with Laganiere the day before he died. And on the day of Laganiere's death, the evidence showed Mauseth continuously checked on him as assigned and it was not until the final check that anything unusual was observed.

The Circuit Court also agreed with the lower court's denial of the trustee's assertion that the supervisor failed to train Mauseth. To win on this issue, the trustee had to show that the supervisor "was deliberately indifferent to or tacitly authorized the offending acts." The trustee failed to meet this standard--no evidence was entered regarding Mauseth's supervision or training, nor was there any allegation that the supervisor knew of problems with Mauseth's performance.

Finally, the appellate court affirmed the District Court's rejection of the trustee's attempts to hold Olmstead County Adult Detention Center or the County liable under § 1983. The trustee failed to show that any officer had deliberately disregarded Laganiere's medical needs in violation of the Eighth Amendment.

http://media.ca8.uscourts.gov/opndir/14/11/141088P.pdf (last accessed Dec. 4, 2014)