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FEATURED CASE:

Eleventh Circuit Holds: Police Officer May Be Liable for Unconstitutional Seizure After Fatally Shooting Incapacitated Dog.

***Plowright v. Miami Dade County*, No. 23-10425 (11th Cir. 2024)**

In a case of first impression, the Eleventh Circuit held that a police officer's fatal shooting of a pet dog constitutes a seizure under the Fourth Amendment, and that such a seizure is unreasonable unless the officer has reason to believe the animal poses an imminent danger. The court found that the egregiousness of the officr's alleged conduct in shooting an already-incapacitated dog was so obvious that it violated clearly established law, even without factually similar precedent. The decision aligns the Eleventh Circuit with the consensus among other circuits and establishes a framework for analyzing the constitutionality of police use of force against domestic animals in § 1983 cases.

Background: Sylvan Plowright ("Plowright") called 911 to report a trespasser near his home in Miami-Dade County. Miami-Dade police officers Leordanis Rondon ("Rondon") and Sergio Cordova ("Cordova") responded to the call. As Plowright came out to greet the officers, they drew their guns and shouted at him to show his hands. When Plowright's dog, Niles, an American Bulldog ("Niles"), entered the scene, the officers ordered Plowright to control him. Rondon then fired his taser at Niles, sending him into shock. While Niles was incapacitated, Cordova fired at least two shots, killing the dog.

Plowright filed a lawsuit in federal court against Miami-Dade County, its police chief, and the two officers. His amended complaint asserted claims under 42 U.S.C. § 1983 for unreasonable seizure through excessive force against Cordova, intentional infliction of emotional distress against Rondon and Cordova, negligence and negligent training and supervision against the county, and negligent supervision against the police chief. The district court dismissed the amended complaint, finding that Cordova was entitled to qualified immunity and that the other defendants were shielded by state statutory immunity or had not been properly served. Plowright appealed to the Eleventh Circuit.

Questions of Law:

1. Does an officer's use of deadly force against a domestic animal constitute a seizure under the Fourth Amendment?
2. If so, was the seizure of Plowright's dog objectively unreasonable under the circumstances alleged?
3. Was the constitutional right against unreasonable seizure of a domestic animal clearly established at the time of the incident?
4. Did Plowright adequately plead claims for intentional infliction of emotional distress against the officers under Florida law?
5. Did Plowright adequately plead Monell claims against Miami-Dade County under § 1983?

Holdings:

The Eleventh Circuit held that the use of deadly force against a domestic animal is a seizure of personal property under the Fourth Amendment. The court also held that, accepting the facts alleged in the complaint as true, no reasonable officer could have believed Plowright's dog, Niles, posed an imminent danger when he was already incapacitated by a taser. Therefore, Officer Cordova's actions in fatally shooting Niles were objectively unreasonable under the circumstances.

Furthermore, the court held that even without factually similar precedent, the unconstitutional nature of Cordova's alleged actions was obvious under general Fourth Amendment principles, satisfying the "clearly established law" prong of qualified immunity. On the state law claims, the court found that the complaint stated a valid claim of intentional infliction of emotional distress against Cordova, as his actions in fatally shooting Niles without justification after the dog was incapacitated were sufficiently outrageous and caused severe distress to Plowright. However, the court held that Officer Rondon's tasing of Niles did not rise to the level of outrageousness required for an intentional infliction of emotional distress claim under Florida law. Finally, the court affirmed the dismissal of Plowright's Monell claims against Miami-Dade County, finding that the complaint did not adequately allege facts showing an unconstitutional policy or custom.

Analysis: The Eleventh Circuit first held that shooting a domestic animal is a Fourth Amendment seizure, subject to reasonableness analysis. Niles, as Plowright's personal property under Florida law, was an "effect" protected by the Fourth Amendment. Cordova meaningfully interfered with Plowright's possessory interests by killing Niles.

The court then balanced Plowright's property interests against the government's interest in protecting life. It held that a reasonable officer may use deadly force against a domestic animal only if the officer reasonably believes the animal poses an imminent danger. Here, accepting the complaint's allegations as true, Niles posed no such danger after being incapacitated by the taser.

In reaching its conclusion on the § 1983 claim against Officer Cordova, the Eleventh Circuit relied on a combination of Fourth Amendment principles, persuasive authority from other circuits, and the obvious egregiousness of Cordova's alleged conduct. The court first established that a domestic animal, as personal property under state law, is an "effect" protected by the Fourth Amendment. It then reasoned that by killing Niles, Cordova meaningfully interfered with Plowright's possessory interests, constituting a seizure.

To determine whether this seizure was reasonable, the court balanced Plowright's property interests against the government's interest in protecting life. Drawing on the consensus among other circuits (see footnote 4 for the courts string citation), the Eleventh Circuit adopted the rule that a reasonable officer may use deadly force against a domestic animal only if the officer reasonably believes the

animal poses an imminent danger. The court found that the complaint's allegations, taken as true, clearly showed that Niles posed no such danger after being incapacitated by the taser.

While acknowledging the lack of factually similar binding precedent, the court emphasized the Supreme Court's guidance in Hope v. Pelzer that officials can be on notice that their conduct violates clearly established law even in novel factual circumstances. The court found that the alleged egregiousness of Cordova's actions—fatally shooting a helpless animal that posed no threat—was so obvious under general Fourth Amendment principles that it satisfied the "clearly established law" prong of qualified immunity, even without a precisely analogous case.

On the state law claims, the court found the complaint stated a valid claim of intentional infliction of emotional distress against Cordova. Fatally shooting Niles without justification after he was incapacitated was outrageous and caused severe distress. This overcame statutory immunity. However, Rondon's tasing did not rise to that level.

Finally, the court affirmed dismissal of the Monell claims against the county, finding insufficient factual allegations of an unconstitutional policy or custom.

In sum, the Eleventh Circuit reversed the dismissal of the § 1983 and emotional distress claims against Cordova, but affirmed dismissal of the claims against the other defendants.

By recognizing that the killing of a domestic animal by police is a Fourth Amendment seizure, this decision brings the Eleventh Circuit in line with the overwhelming consensus among other circuits. It establishes a clear rule for assessing the reasonableness of such seizures and puts officers on notice that using deadly force against a domestic animal is unconstitutional unless the animal poses an imminent danger. This holding will likely make it easier for plaintiffs in the Eleventh Circuit to overcome qualified immunity in cases involving the unjustified shooting of pets by police, as they will not necessarily need to point to a factually similar precedent if the violation of their rights is obvious. The decision may also prompt police departments in the Eleventh Circuit to provide additional training on handling encounters with domestic animals to minimize the risk of unconstitutional seizures.

Plowright v. Miami Dade County

SHORT SUMMARIES:

4th Circuit – Building Code – Preemption – Single Family Building

This case involves the issue of preemption by the state of local control over zoning. The central dispute involves a property called “The Chesapeake” situated on the Atlantic Shore on the Outer Banks of North Carolina. The zoning in that area prohibits hotels, bed and breakfasts, and other commercial structures it allows single family dwellings. The Chesapeake, the owners claimed, purports to be a single family dwelling having 24 bedrooms, 25 bathrooms and a pool designed with two wings connected by covered walkways to a central unit. The county concluded that the building was not a single family dwelling and won on appeal in the state courts. The owners took the matter to the federal courts claiming diversity and argued that an amendment of state law changed the result in the previous state case. The amendment prohibited local governments from using the definition of building, dwelling, dwelling unit, etc. from differing with any state definition including one adopted by the Building Code Council. The Council defined the Chesapeake as a single-family dwelling and the court concluded that statutory construction prevented the county from considering a 25 bedroom, 24 bath structure of 15,000 square feet and a pool to be anything other than a single family dwelling.

Currituck County v. Letendre

4th Circuit – Unlawful Seizure – Probable Cause – Qualified Immunity

The national news organizations headlined the facts of this case when a serving officer of the United States Army was stopped, detained and subjected to restraint by local police officers for a minor traffic violation. The basic supporting facts for the case involve the officer driving a vehicle with a temporary license plate that was taped to the inside rear window of the vehicle. An officer noticed the vehicle travelling without what the officer could see as a license plate and pulled behind the vehicle and started the emergency lights, etc., to get the driver to pull over. Instead of pulling over immediately, the driver slowed to about 18 mph and pulled into the first well-lit area a BP station. From the court’s opinion:

> “At the time of their stop of Lt. Nazario, the Policemen had probable cause for only a single traffic infraction. Because it was a seizure that was justified only by a traffic violation, the stop of Nazario would become unlawful “if it is prolonged beyond the time reasonably required to complete the mission of issuing a ticket for the violation.” Rodriguez v. United States, 575 U.S. 348, 350-51 (2015) (internal quotation marks and brackets omitted).Generally, the “mission” or purpose of a traffic stop involves “checking the driver’s license, determining whether there are outstanding warrants against the driver, and inspecting the automobile’s registration and proof of insurance.” Id. at 355.”

The facts in the case paint a sympathetic picture, perhaps in my mind because the Plaintiff was a serving Army officer. As so often happens, the police shouted conflicting instructions at the officer – “show us your hands” vs. “open your door” among others. One police officer shouted words that could be taken as death threats and for that reason coupled with pointing a firearm at the Plaintiff for an extended time when the Plaintiff was not resisting and compliant and only stopped for a minor traffic violation, the police officer’s qualified immunity was reversed in this appeal. The appeal was from a jury verdict that the Plaintiff won but lost in terms of damages, so reading the case rather than simply my report will help give a better understanding of the details. Curiously, the event ended

when the officers gave the military officer the option to let bygones be bygones rather than to arrest him.

The learning lesson here should be to train officers to issue thoughtful orders not ones that are inherently conflicting. A person cannot keep their hands visible and open a car door from the inside under almost any circumstances. Similarly, maintaining composure sufficiently to protect oneself and other police officers and the public without making threats that exceed the justification. Threats to shoot a nonresistant traffic offender are different from threats to shoot an armed felon.

Caron Nazario v. Joe Gutierrez

4th Circuit – Due Process – Qualified Immunity – Repossessions

An officer is called to a repossession in progress with a car on a hook and debtor behind the wheel attempting to thwart the repossession. Because it was unsafe to tow with person in vehicle police were called. Officer tells debtor to get out of car and car was towed. Officer and others sued by debtor for due process and other claims. Qualified immunity. Nice concurrence by Wilkinson. Despite nice wins in this case, advisors should work with police on developing policies for these types of situations. I couldn't tell from my quick review if there was anything in the fact pattern to understand if the repossession was itself erroneous, so teaching component may need to address the question of the underlying question of authority to repossess on its face. BTW seemed to me the officer did the right thing, but that might be different if the car had not yet been on the hook.

Atkinson v. Godfrey

5th Circuit – How to lose a $50 Million Verdict – Professionalism

This case doesn't involve local government, but I bring it to your attention because we've seen several professionalism issues arise recently. In this case two lawyers battled it out at trial and managed to highlight the depths to which the profession has fallen in recent years. You'll need to read the case to see how a lawyer's closing argument can be sue prejudicial that an appeals court will overturn a huge verdict. Apart from attacking the party and lawyer based on regional prejudice, the closing argument included the following exchange where the attorneys attacked their opposing counsel Mr. Mychalowych:

> Shamoun also accused Mychalowych of attempting to "hide evidence" and called him an "embarrass[ment] for the profession." Shamoun suggested that Mychalowych must think that each juror was "an idiot." He called Mychalowych's actions "low class," "classless," "ruthless," and"disgusting." Finally, Shamoun insisted that: [Mychalowych] defied this judge. He defied the instructions of the Judge. . . . He treated us all here with disrespect. He tried to hide evidence. . . . Judge had to scold him. I have never seen anything like this in the over 30 years that I have practiced in this town. Never have I seen what y'all witnessed. I am embarrassed for the profession, ma'am. I'm embarrassed.

Khoury, for his part, implied that Clapper had paid a witness to testify, and referred to one of Clapper's expert witnesses as a "paid prostitute from Michigan." Khoury called Mychalowych a "dishonest broker" who was "deceitful and deceptive." After calling Mychalowych dishonest, Khoury went on to say that "where I come from, we don't listen to another germ that comes out of that person's mouth."

As part of its conclusion the court noted:" We remind all practitioners in our court that zealous advocacy must not be obtained at the expense of incivility. As Judge Reavley aptly explained, "Although earnest, forceful, and devoted representation is both zealous and proper, Rambo and kamikaze lawyers lead themselves and their clients to zealous extinction."

Clapper v. American Realty Investors

6th Circuit - Qualified Immunity - Judicial estoppel - Heck Doctrine

Officers execute a search warrant based on a CI's description of a drug sale in which the Plaintiff in this 1983 action was the seller at the house to be searched. On executing the warrant, the officers found the plaintiff hiding and when he did not readily comply with their commands they forcibly subdued him. He later pled guilty to attempting to resist arrest and then sued the officers for excessive force. The officers defended on Heck bases, judicial estoppel, and qualified immunity. The lower court denied all. The panel affirmed the lower court concluding it did not have jurisdiction to decide the Heck defense and that the factual dispute precluded overturning the lower court ruling. The officers argued that the minimum force used was not constitutionally protected. The court gave an historical analysis regarding the law of arrest and force which each of us should review and discuss with our officers.

Chaney-Snell v. Young

6th Circuit – Shooting Ranges – Zoning – 2nd Amendment

Can a local government deny authority for a shooting range under its zoning or does the 2nd Amendment prevent such local regulation? The panel affirms judgment for the local government. The zoning regulations withstand the challenge.

Oakland Tactical Supply, LLC v. Howell Twp., Mich

6th Circuit – Takings – Terms of Office – 1st – 4th -14th Amendments

Most of us know that politicians like to stay in office. In this case a Mayor who had served four terms when a charter amendment was passed setting mayoral term limits to coincide with those of the city council at three terms. The Mayor nevertheless filed to run for a fifth term. Having been excluded from the ballot, the mayor appealed through the state courts only to lose on the argument that the running of the terms could only begin after the amendment. Having lost in state court the mayor sought federal relief. "He brought claims under 42 U.S.C. § 1983, alleging that Defendants violated his First Amendment rights to free expression and association, his Fifth Amendment right to due process of law, and his Fourteenth Amendment right to equal protection under the law." The lower court dismissed the suit for failure to state a claim. The panel affirmed writing a well reasoned decision that might easily have been reduced to the few words "You've got to be kidding me!" Clearly the courts take these cases seriously. Knowing when to step aside ought to be a requirement for leaders everywhere.

Fouts v. Warren City Council

6th Circuit – Fitness for Duty – Due Process – Right to refuse medical evaluation – abandonment

Sometimes I read a case and think that I must be missing something, so feel free to follow up and help on this. In the case, the court notes that the Plaintiff did not lose his position for refusing a fitness for duty evaluation, but rather, when the Defendants reasoned that he had a disability and began the accommodation process, he failed to attend a required meeting which under the CBA allowed the employer to dismiss him for job abandonment. That fact is fairly deep into the analysis of this case and yet I wonder why? Why wasn't it conclusive and didn't justify an unreported decision simply stating that fact. Anyway, the bulk of the case addresses the Plaintiff's refusal to comply with fitness for duty evaluations required by the employer. The court acknowledges that other circuits have found protected interests that can be impacted by these evaluations but noted that the employee did not rely upon them, but instead relied solely on a right to refuse medical treatment. Recognizing some circumstances that might allow an employee to refuse medical treatment, the court concluded that fitness for duty in this case was not one. Employee loses.

Capen v. Saginaw County, Mich

8th Circuit – Repackaged Appeals don't work – Law of the case

So the lower court granted summary judgment to officers, the Plaintiff appealed. The Circuit panel concluded that the facts were in dispute as to whether probable cause existed. The case was remanded. The Iowa court decided a case addressing a section under which the Plaintiff was arrested and the defendants filed for summary judgment again based on the case and its clarification of the law. New appeal, reversed again – law of the case applies as the defendants conceded that no facts changed and the court saw the defendants' arguments as simply repackaged with the new case cited.

Bates v. Richardson

8th Circuit – Covid – Evictions – Qualified Immunity

The virus underlying Covid just keeps on giving and in this case gives us an interesting twist. When Covid hit, the county created a program for vulnerable residents, including the homeless, that placed people in hotels rooms. The program included residents signing agreements that recognized the county would pay the fees for their stay, but once the county stopped, the residents either had to pay themselves or leave. These agreements were with the county and not the hotel. The program ended and the county stopped paying. The governor issued an order preventing eviction for non-payment of rent, protecting tenants from eviction due to the effects of Covid. The hotel sought to have the resident removed for non-payment and the police were called after a lengthy back and forth with the resident. When the police arrived, they did the right thing – they asked legal counsel for advice. Attorneys in the county attorney's office reviewed the law, the governor's order and concluded that the order did not apply to hotel guests. They advised the police that they could evict the person. Suit followed against the lawyers and qualified immunity was sought and granted by the lower court. On appeal the panel affirmed on what seemed like pretty solid grounds: Qualified immunity protects officials from being held liable for acting when the law is not clear and this being the first of its kind

lawsuit over the issue; it was anybody's guess what the law was. Frankly, the opinion of counsel seemed firmly based and the court could just have easily concluded that their advice was correct and granted judgment in their favor.

Davitt v. Spindler-Krage

8th Circuit – Jails – Class Actions – Monell

This case involves claims of oppressive conditions in a local jail. The lower court eventually certified a class to bring claims against the city for hosting a jail that imposed these oppressive conditions. Long story short, the panel reversed the certification of the class recognizing that many claims of a prisoner are personal and under Monell require some degree of policy attribution to the local government. It's more complex than I can explain briefly, so take a look if you may be faced with class actions regarding jail conditions. Daubert also raised its impressive head, so you'll want to see how the court discussed that.

Cody vs. City of St. Louis

8th Circuit – Qualified Immunity – First Amendment – Public Areas

This case involves what might be a frequent problem for police and local government. People who believe themselves to be messengers of faith (or some other principle), moved by a higher power or strong motives wish to espouse their beliefs in public areas hoping to move others to join them. That's certainly what the First Amendment protects. Some venues attempt to regulate these folks by recognizing that others might prefer to engage in their own activities without the annoyance that they may find in these vendors of thought. In Davenport at a city sponsored event and area of the city was cordoned off for a festival and various vendors applied to participate to sell goods and crowds were invited to enjoy the festival. Those who wished to proselytize their views were asked to do so in a specific area which they agreed to do. Vendors, nearby, found the loud preaching and the public's obvious avoidance of the proselytizers annoying and asked for relief. The police asked the group to move, which they did and continued seeking converts or sympathizers for another two hours. They then sued the city and its police. Both the lower court and the panel found that this whole area of the law was way too convoluted to hold the police or the city liable for a violation of Section 1983. The police on the grounds of Qualified Immunity and the city did not violate any rights by having a policy to hold a festival and cordon off streets. There is quite a bit of analysis that those facing these issues should be aware of and reviewing the case will be helpful.

Sessler vs. Davenport

8th Circuit – Excessive Force – Qualified Immunity

This is one of those cases in which allegations can defeat a claim of qualified immunity if the allegations assert bad facts. Here, the claim involved a traffic stop. From the perspective of a government attorney, the stop must have involved more than a run of the mill stop (or a bunch of officers were looking to get overtime), as four other officers showed up at the scene. The complaint apparently alleged the following:" After she exited her vehicle, Officer Metcalf handcuffed her and, without warning, yelled at her. Then, Officer Metcalf forced Watkins either "into the front of her

vehicle" or into "the front seat of Officer Metcalf's car." While Watkins was being forced into the vehicle, and even while she was restrained in a vehicle, the other officers pepper sprayed her and repeatedly hit her on the leg with a baton. At some point, the officers also pepper sprayed and hit Watkins "while she was on the ground." The officers eventually transported Watkins to a police station. Watkins was later treated for injuries to her legs, face, and body." The court concluded that force used on a restrained, non-resistant misdemeanant was clearly unlawful at the time of the event and therefor no immunity. There did not seem to be body camera or other video evidence in this case. One suspects the facts at trial may tell a more complicated story about why the force was used.

Watkins v. City of St. Louis

8th Circuit – ADA – Accommodation – Service Animal

A newly minted pharmacist with diabetes had a condition that prevented the pharmacist from knowing when blood sugar levels were dropping. Some service dogs are able to provide support and alert a person to a drop of blood sugar levels when trained. Part of the training requires constant involvement between animal and person for a six-month period. The pharmacist worked well and was advancing in the job. A service animal became available, and the pharmacist sought to bring the animal to work during the six month training period. The employer met with staff and concluded that the animal's presence would jeopardize patient health, so denied the accommodation. The case went to a jury where damages were awarded. On appeal the court reversed because bound by a previous circuit decision that provided: "Providing a service dog at work so that an employee with a disability has the same assistance the service dog provides away from work is not a cognizable benefit or privilege of employment." Hopman, 68 F.4th at 401." So, as a matter of law, the Plaintiff could not overcome the evidence that Plaintiff could perform all of the essential functions of the work without the accommodation and was not denied benefits of the position.

Howard v. City of Sedalia

9th Circuit – Qualified Immunity – the 5th and 6th Shots – Excessive Force

This case began with a multicar collision injuring several people. The police radio informed the responding officers that the suspect was in a black vehicle, had a knife and was trying to injure himself. A bystander pointed to the black pick-up truck with a man inside informing the officers that the driver caused the collision. Other information pointed to the person in the black vehicle harming himself. As the officers approached a man crawled shirtless from the pickup with what appeared to be a knife in his hands. One officer called out to drop the weapon and show hands. The man continued to approach the officer. Ultimately, continuing to fail to heed the officer's commands, the officer shot the man with a two shot volley. The man though wounded continued to scream and yell at the officer and attempted to rise. The officer sent in two more shots in another volley. Still not fully subdued the man tried to rise again and two more shots finally subdued him, killing him. The whole incident took about 20 seconds and was filmed. The time between volleys was about 2 seconds. The court had no trouble with the first two volleys and upheld summary judgment concluding no reasonable jury could find fault with the officer's actions. As to the fifth and sixth shot the court concluded that the issue of reasonableness was debatable but that qualified immunity applied. The court upheld the lower court's grant of SJ to the defendants as to a 14th Amendment claim and as to Monell liability; but reversed as to the state law claims based on the panel's conclusion that a jury must decide if the 5th and 6th shots made the officer culpable. BTW, the man had a box cutter which

foreclosed the Plaintiffs' claims that he was unarmed. To your writer, two seconds seems a very short time to say an officer ought to be able to react sufficiently to know whether to continue firing to subdue someone is necessary or not. Two seconds can seem a long time during the NCAA basketball tournament, but I'm guessing awfully short when your life is at risk.

Estate Of Hernandez v. City Of Los Angeles

9th Circuit – Workplace Harassment – Bankruptcy

Phoenix gets a tip of the hat for a great job in this case. Employee files for bankruptcy and debts are discharged. Employee files a suit for workplace harassment that includes years of harassment occurring pre bankruptcy and post-bankruptcy. During bankruptcy, employee notes in the petition that no claims exist. In defending the suit for harassment, city discovers the bankruptcy and moves for summary judgement. Bankruptcy trustee learns of suit and reopens the bankruptcy and intervenes in the suit. The trustee and city agree to settle the claim and both seek to dismiss the suit for lack of standing and alternatively estoppel for failure to disclose the claim in the bankruptcy case. The panel affirms the dismissal based on lack of standing and does not reach the alternative basis for the District Court's dismissal. Some years ago, we mentioned that checking bankruptcy records when defending claims against the local government can lead to a great defense. This case reaffirms that advice.

Bercy v. City of Phoenix

9th Circuit – USERRA

The application of USERRA to government employees raises a host of issues and questions. Local government attorneys who fail to understand this law risk creating significant liability for their clients. IMLA has held a number of sessions involving USERRA and no doubt will hold more. Members can access IMLA archives to refresh themselves on this important area of the law. The Ninth Circuit recently certified the following question to the Washington Supreme Court:

> "Is a public employee entitled to paid military leave under Wash. Rev. Code Ann. § 38.40.060 if the employee is not "scheduled to work" by the employer because the employee is on active duty during an extended military leave of absence?"

The answer to this question, the court concludes is dispositive of the USERRA claim.

Bearden v. City of Ocean Shores

11th Circuit – Bivens – Joint Federal Local Task Force – Excessive Force

Mrs. Robinson sued several officers for shooting and killing her son. The son was wanted on several warrants and a joint task force sought to bring him in. The son died in a shootout in which allegations were made that a couple of the officers continued shooting when the fellow was already incapacitated. The 1983 suit failed when the courts concluded that the officers were acting as federal officials at the time, so were not acting under color of state law. The Bivens claim fails because the court concludes that under Egbert suing the agents of the task force creates a new claim and that

the courts are not in a better position than Congress in addressing a remedy. The court also noted that certain administrative remedies exist precluding the court from creating a new cause of action under the Constitution. See Egbert v. Boule, 596 U.S. 482 (2022).

Robinson v. Sauls