IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

D.P. et al.,

Plaintiffs,

v.

SCHOOL BOARD OF PALM BEACH COUNTY, et al.,

Defendants.
_____/

CASE NO.: 21-81099-CIV-CANNON

DEFENDANTS' REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

COME NOW, the Defendants, the School Board of Palm Beach County, Florida (the "School Board"), Dr. Donald E. Fennoy, II, Daniel Alexander, Officer Jose Cuellar, Officer Joseph M. Margolis, Jr., Officer Howard Blochar, Officer Johnny Brown, and Officer Jordan Lauginiger[1], by and through their undersigned counsel, and files this Reply to Plaintiff's Opposition to School Board's Motion to Dismiss.

I. Argument by the School Board Defendants

"The wisdom and necessity as well as the policy of a statute are authoritatively determined by the legislature. Courts may inquire only into the power of the Legislature to lawfully enact a particular statute." *Dutton Phosphate Co. v. Priest*, 65 So. 282 (Fla. 1914). In the present matter, as evidenced in the Amended Complaint and Plaintiffs' Opposition to Defendants' Motion to Dismiss, the Plaintiffs are asking this Court to evaluate the wisdom and necessity of the utilization of the Florida Mental Health Act by Florida School Districts without instituting a direct challenge

[1] All defendants, with the exception of Officer Margolis, are employed by the School Board of Palm Beach County and are represented by its General Counsel's Office. Officer Margolis is employed by the City of Lantana and is represented by independent counsel. Pursuant to the Court's Order, all defendants submit this joint Reply. Officer Margolis' portion of this Reply begins on page 7, *infra*.

to the legality or constitutionality of the statute, only to the Defendants' application of it. They have not raised any arguments or sought relief from the Court regarding whether the Legislature has the power to lawfully enact the Florida Mental Health Act, nor do they seek to test the constitutionality of the Florida Mental Health Act, rather they seek to end what they have called the illegal utilization of the Florida Mental Health Act in Florida Schools.

The Plaintiff's Opposition reinforces many of the arguments Defendants' made in the Motion to Dismiss, in that Plaintiffs utilize almost ten (10) pages of their opposition alleging additional and new facts that were not included in the Amended Complaint. If Plaintiff's Amended Complaint was indeed sufficient as pled, then the ten pages of additional and new allegations would be unnecessary to overcome Defendant's Motion to Dismiss. Notwithstanding the utilization of additional facts in their Response to Defendants' Motion to Dismiss,, Plaintiffs still cannot overcome the deficiencies in their Amended Complaint.

The Plaintiffs' Opposition continues to accuse the Defendants of "illegally" using the Florida Mental Health Act and seeks to impose obligations on Defendants that do not exist in the statute. Plaintiffs' issues are with the lack of parental consent necessary for the initiation of transportation for an involuntary examination; with the handcuffing of students by School Police during the transportation; the lack of a consultation with a medical professional prior to the transportation for an involuntary examination; and finally, with Defendants' not releasing students to any adult upon request once an involuntary examination is deemed necessary. Yet, none of this is required under Florida's Mental Health Act. These are requirements that the Plaintiffs wish the Legislature would require under the Act, however, this is rightfully an issue between Plaintiffs and the Legislature to resolve, not the Courts to implement on their own. Furthermore, Plaintiffs attempt to draw a distinction between minors and adults under the Act, however, the plain language

of the statute only references different treatment of minors when it comes to the amount of time a minor may be held at the treating facility before being examined, and attempts to contact the minor's guardian. *See* Fla. Stat. §§ 394.463(2)(g) (requiring an examination of a minor to take place within 12 hours after arrival); and 394.4599(2)(c)2 (requiring the facility to attempt parental contact on an hourly basis during the first 12 hours after arrival).

The Plaintiffs seek to prohibit ANY use of the Florida Mental Health Act in Defendant's schools, and by extension ANY school in Florida. They trivialize the threats of harm to self and/or others which are stated in the narratives and witness statements contained in the police reports that Plaintiffs reference and cherry pick information from, yet fail to provide complete copies to the Court, likely to circumvent possible dismissal of certain claims, as many of the police reports contain information that would support the good faith and qualified immunity of the Defendants, specifically the officers involved. When looking at each of the reports in their entirety, it is clear that each of the officers chose to transport a student based on their actions and/or statements and not because of their disability. The officers' rationale for each of the transports was outlined in Defendants' Motion to Dismiss. The Plaintiffs seem to want to add a provision into the law that exempts individuals with disabilities from the provisions of the Florida Mental Health Act. However, no such exemption exists[2].

The Excessive Force Claims

The Plaintiffs concede that for four of the minor Plaintiffs the only excessive force they have alleged is the handcuffing of the students. As stated in the Motion to Dismiss, this is

[2] The Plaintiffs seem to pointedly ignore the possibility that a student with a disability such as those suffered by the minor Plaintiffs may concurrently suffer from a mental illness. It is not the responding law enforcement officers' job to sort out what behaviors may be cause by, ADHD or autism, for example, and those which may result from a life-threatening depressive episode – nor should it be. That kind of determination is appropriately left to mental health professionals at the facilities who can appropriately treat the students.

insufficient to establish an excessive force claim. The mere handcuffing of a person for the safety of themselves or others when taken into custody under the Florida Mental Health Act does not shock the conscience. Also, the Plaintiffs' allege that the District employees are instructed to handcuff the students by district policies and training materials, yet fail to point to any specific written policy. Conversely, the Florida Mental Health Act clearly states law enforcement shall take a person into custody for an involuntary examination in each of the three categories set forth in the statute. Regardless of whether the involuntary examination is deemed necessary by a Court of law, medical provider or law enforcement, the only entity permitted to take the person into custody is a law enforcement officer. Where the legislature has deemed that a law enforcement officer is the appropriate entity to take a citizen, whether an adult or minor as the Statue does not set forth different criteria, it is not for the Plaintiffs or the courts to alter it.

Interference with Parental Rights

The rights to care, custody and control, and for medical decision-making are not absolute. The Mental Health Act itself is a means by which such rights are limited. It has no provision for parental consent before evaluating or even committing children. It has no provision requiring parental consent before evaluating a child – in fact, the same would interfere with its purpose. A child in crisis would be ill-served if mental health services were to be withheld from him or her merely because a parent disagrees with the need for an evaluation.

In this respect, the Plaintiffs here are attempting to make an end-run around challenging the constitutionality of the Mental Health Act itself. *See* Opposition at p.38, FN 34 (stating that compliance with the Baker Act is irrelevant to issue of whether children's rights were violated).

In so doing, they avoid providing an opportunity for other interested parties – such as the State's Attorney General – to intervene. *See* Fed. R. Civ. P. 51; and Fla. R. Civ. P. 1.071.

The Officers are Entitled to Qualified Immunity

The Plaintiffs have taken the position that officers' handcuffing of the minor Plaintiffs was "obviously" unconstitutional conduct, relying in large part on *Gray v. Bostic*, 458 F.3d 1295 (11th Cir. 2006). *See* Opposition at p.32. The Plaintiffs' reliance on *Gray,* however, is misplaced. In *Gray*, the minor Plaintiff was handcuffed by a deputy acting as a school resource officer as he questioned her over failing to follow her teacher's instructions:

> The problem in this case for Deputy Bostic is that, at the time Deputy Bostic handcuffed Gray, there was no indication of a potential threat to anyone's safety. The incident was over, and Gray, after making the comment, had promptly complied with her teachers' instructions, coming to the gym wall and then to Coach Horton when told to do so. There is no evidence that Gray was gesturing or engaging in any further disruptive behavior. Rather, Gray had cooperated with her teachers and did not pose a threat to anyone's safety. In fact, Coach Horton had insisted that she would handle the matter, but Deputy Bostic still intervened. Deputy Bostic does not even claim that he handcuffed Gray to protect his or anyone's safety. Rather, Deputy Bostic candidly admitted that he handcuffed Gray to persuade her to get rid of her disrespectful attitude and to impress upon her the serious nature of committing crimes. In effect, Deputy Bostic's handcuffing of Gray was his attempt to punish Gray in order to change her behavior in the future.

Gray v. Bostic, 458 F.3d at 1306.

The facts alleged in this case are quite different from those in *Gray*. First, each of the students handcuffed in this case are alleged to have been handcuffed for transportation to the hospital for evaluation. In *Gray*, the student was handcuffed during an "investigatory stop," with no reasonable claim that the student presented a threat to anyone's safety. *Id.* at 1305-06. In our case, each of the students is alleged not to have merely "act[ed] out, yell[ed], or [was] otherwise

unruly, as the Plaintiffs mischaracterize the Defendants' position. *See* Opposition at p.21. Rather, each of the minor Plaintiffs are alleged to have acted out violently and/or expressed that they wished to do harm to themselves or others.

Similarly, the cases cited in footnote 26 of the Plaintiffs' Opposition all involved calm, compliant children who were handcuffed and presented no danger to themselves or others. In *E.W., by and through T.W. v. Dolgos*, 884 F.3d 172 (4th Cir. 2018), for example, the student was handcuffed three days after a fight and presented no hostility or disobedience. *See* E.W., 884 F.3d at 181-82. It should be noted, that in *E.W.*, despite the 4th Circuit finding that the use of handcuffs under the circumstances was excessive, the officer involved was still entitled to qualified immunity, because "[the plaintiff's] right not to be handcuffed under the circumstances of this case was not clearly established at the time of her seizure." *Id.* at 187.

In this context, it is apparent that the officers in question had at least arguable probable cause to detain and transport the students to the hospital for evaluation, as authorized under the Mental Health Act, and to handcuff them. Where students have recently been acting out in a violent way or expressed a desire to do harm to themselves or others, handcuffing them is not unreasonable. In *K.W.P. v. Kansas City Public Schools*, 931 F.3d 813 (8th Cir. 2019) the Eighth Circuit Court of Appeals found that handcuffing a seven-year-old student to a chair for fifteen minutes did not violate his constitutional rights, and even if it did, the police officer and principal involved were entitled to qualified immunity. *See K.W.P.*, 931 F.3d at 827-28. Although *K.W.P.* did not involve transporting the student for a mental health evaluation, the student's behavior was described similarly to some of the minor Plaintiffs in this case: he yelled at a classmate, expressed that he wanted to push the classmate, yelled at two school employees, and then after initially physically resisting the officer's attempts to escort him to the front office, he became compliant

when the officer handcuffed him. *See Id.* at 817-818. By the time he arrived at the front office, he obeyed the officer, sat in the chair and no longer attempted to leave; nevertheless, the officer handcuffed him to the chair anyway. *See Id.* at 818.

The 8th Circuit held that neither the police officer nor the principal violated the 14th Amendment under the circumstances, which included handcuffing the student and maintaining the handcuffs even after the student deescalated. Further, the court noted that even if their actions were questionable, the student could not show that a reasonable official "'would have been on notice that [their] conduct violated a clearly established right.'" *Id.* at 827-28 (quoting *Cravener v. Shuster*, 885 F.3d, 1135, 1140 (8th Cir. 2018) (quoting *De Boise v. Taser Int'l, Inc.*, 760 F.3d 892, 896 (2014)). As in *K.W.P.*, the Plaintiffs in this case "fail 'to identify a case where an officer is acting under similar circumstances … was held to have violated the Fourth Amendment." *Id.* at 828 (quoting *Moore-Jones v. Quick*, 909 F.3d 983, 985 (8th Dir. 2018).

II. Officer Margolis' Argument[3]

A. Plaintiff's Complaint Should be Dismissed as an Impermissible Shotgun Pleading

As set forth in the Motion to Dismiss, Plaintiff's First Amended Complaint ("Complaint") must be dismissed as a shotgun pleading. Plaintiffs admit that they have "combined claims by multiple Plaintiffs against multiple Defendants into single counts . . . ." ECF No. 50 p. 10. The Complaint is therefore a quintessential shotgun pleading. *Weiland v. Palm Beach Cty. Sheriff's*

[3] Officer Margolis is the only Defendant who is not employed by the School Board. Accordingly, he is represented by independent counsel and he makes the following arguments against allegations made specifically against him. To the extent that the Defendants' arguments and citations to authority are supportive of each other, the Defendants adopt the same.

Off., 792 F.3d 1313, 1323 (11th Cir. 2015)(noting that one form of shotgun pleadings is one "asserting multiple claims against multiple defendants without specifying which of the defendants are responsible for which acts or omissions, or which of the defendants the claim is brought against.").

Plaintiffs nonetheless claim the Complaint is properly pled because they combined the claims into single counts "where the facts and legal issues were common." ECF No. 50 p. 10. Even if this were an acceptable form of pleading (which it is not), the facts surrounding the plaintiffs and defendants are not common. For example, Count XIII is a claim by D.P., E.S., L.A., W.B., M.S., DRF, and FL NAACP against all defendants. Compl. P. 63. There are no common factual allegations with regard to D.P., E.S., L.A., W.B., M.S., as each of those plaintiffs are children of varying ages with distinct factual allegations giving rise to their claims. Plaintiffs' Complaint must therefore be dismissed as a shotgun pleading. *Weiland*, 792 F.3d at 1323.

B. The FL NAACP and DRF Lack Standing to Assert their Claims Against Officer Margolis

Plaintiffs contend that Defendants' Motion "misstates federal law," ECF No. 50 p. 2, yet Plaintiffs clearly misstate to the Court that Officer Margolis has not challenged the FL NAACP and DRF's standing to assert claims against Officer Margolis. Plaintiff assert that "Defendants confine their arguments in their Motion to the individual Plaintiffs' claims. They do not argue that the organizational Plaintiffs, the FL NAACP and DRF, lack standing to state claims." ECF No. 50 p. 9.

A cursory review of the Motion to Dismiss, however, makes clear that Officer Margolis has explicitly challenged FL NAACP and DRF's standing in this case. Indeed, at pages 29-30 of the Motion to Dismiss, Officer Margolis clearly asserts that the FL NAACP and DRF lack organizational standing in this matter. Plaintiffs have failed to address this issue plainly raised in

the Motion to Dismiss, and it is not the Court's burden "to distill every potential argument that could be made based upon the materials before it." *Resol. Tr. Corp. v. Dunmar Corp.*, 43 F.3d 587, 599 (11th Cir. 1995). The Court should thus deem any of Plaintiffs' arguments to the contrary as abandoned. *Cornelius v. JPMorgan Chase Bank, N.A.*, No. 115CV03394ELRLTW, 2016 WL 7468811, at *3 (N.D. Ga. July 21, 2016)(noting that "[w]hen an argument is raised on upon motion to dismiss that a claim is subject to dismissal, and the non-moving party fails to respond to such an argument, such claims are deemed abandoned and subject to dismissal"); *Coal. for the Abolition of Marijuana Prohibition v. City of Atlanta*, 219 F.3d 1301, 1326 (11th Cir. 2000)(finding argument "effectively abandoned" when not asserted in response to motion); *Hudson v. Norfolk S. Ry. Co.*, 209 F. Supp. 2d 1301, 1324 (N.D. Ga. 2001)("When a party fails to respond to an argument or otherwise address a claim, the Court deems such argument or claim abandoned.").

Even if the FL NAACP and DRF's standing arguments were not abandoned, it is clear that they nonetheless lack standing for the reasons noted in the Motion to Dismiss. Thus, the claims by the FL NAACP and DRF against Officer Margolis should be dismissed with prejudice.

C. Officer Margolis is Entitled to Qualified Immunity on Plaintiffs' Unlawful Seizure Claims

As noted in the Motion to Dismiss, Officer Margolis is entitled to qualified immunity unless Plaintiffs can establish that Officer Margolis violated a constitutional right that was clearly established at the time of the incident. *Chaney v. City of Orlando, FL*, 291 F. App'x. 238, 243 (11th Cir. 2008). Plaintiffs appear to assert Officer Margolis violated a clearly established Fourth Amendment right because Officer Margolis had no reason to believe that (1) D.P. was suffering from a mental illness and (2) there was a substantial likelihood that D.P. would cause serious bodily harm in the near future.

As noted in the Motion to Dismiss, D.P. stated "I wish I could shoot you in your fucking head." Exhibit A, p. 1; Compl. ¶ 88.; D.P also stated, "I deserve to be dead," "Shut the fuck up, before I kill you," ["]I will run out of this school and get myself murdered," ["]Grandma does not love me, nobody loves me," and "Right now I am thinking I want to hold my breath so I can die." Exhibit A, pp. 1-4; Compl. ¶ 88. Officer Margolis also observed D.P. "jump on two desk[s] and run to the teacher's desk" where he was "looking at a container that held pens and scissors and place[d] his hands on it." Exhibit A, pp. 4.

Such actions would lead any reasonable officer to believe that D.P. was suffering from a mental illness and posed a danger of serious bodily harm. The fact that D.P. happens to also suffer from ASD would not categorically preclude a reasonable officer from concluding that D.P. required protective intervention under the Baker Act, as suggested by Plaintiff. Indeed, Plaintiffs unsurprisingly cite to no authority in support of such baseless assertion. And D.P.'s alleged after-the-fact claim at the receiving facility that "I just get mad. I don't want to hurt myself" cannot retroactively render the seizure unconstitutional. *Greer v. Hillsborough Cty. Sheriff's Off.*, No. 806-CV-213-T-23MSS, 2006 WL 2535050, at *3 (M.D. Fla. Aug. 31, 2006)("Despite Greer's later insistence that his suicidal iteration was a "joke" [], an attending officer reasonably could construe Greer's nonsensical, incoherent, and ominous remarks (which Greer admits) as requiring protective custody under the Baker Act."). Accordingly, Officer Margolis is entitled to qualified immunity on D.P.'s unlawful seizure claims for the reasons set forth in the Motion to Dismiss.

D. <u>Officer Margolis is Entitled to Qualified Immunity of D.P.s Excessive Force Claim</u>

As noted in the Motion to Dismiss, to determine whether an officer used excessive force, a court must assess whether the officer's actions were "objectively reasonable in light of the facts and circumstances confronting them, without regard to their underlying intent or motivation."

Graham v. Connor, 490 U.S. 386, 397 (1989)(citation and quotation omitted). As detailed in the Motion to Dismiss, Officer Margolis' actions in handcuffing D.P.—who had made repeated suicidal and homicidal remarks—was entirely reasonable under the circumstances.

Further, even if Officer Margolis' actions constituted a Fourth Amendment violation, the constitutional right was not clearly established at the time of the incident. As noted in the Motion to Dismiss, there is simply no case from the United States Supreme Court, the Eleventh Circuit, or the Florida Supreme Court establishing that Officer Margolis violated the Fourth Amendment by transporting D.P. to a medical facility in handcuffs pursuant to Florida's Baker Act.

Plaintiffs nonetheless assert it is clearly established "that handcuffing young, compliant children who pose no threat of bodily harm constitutes excessive force under the Fourth Amendment." ECF No. 50 p. 32. But as noted above, there can be no doubt that Officer Margolis reasonably believed that D.P. posed a threat of bodily harm when he stated, "I wish I could shoot you in your fucking head," "I deserve to be dead," "Shut the fuck up, before I kill you," ["]I will run out of this school and get myself murdered," ["]Grandma does not love me, nobody loves me," and "Right now I am thinking I want to hold my breath so I can die," and was observed "looking at a container that held pens and scissors and place[d] his hands on it." Exhibit A, pp. 1-4; Compl. ¶ 88. Thus, even if there existed a Fourth Amendment right prohibiting "handcuffing young, compliant children who pose no threat of bodily harm," Officer Margolis could not have violated such a right because D.P. clearly posed a threat of bodily harm.

E. <u>P.S. has Failed to State a Claim for Deprivation of her Procedural Due Process Rights</u>

P.S. has failed to state a claim for deprivation of her procedural due process rights. The Complaint alleges that P.S. was denied due process because Officer Margolis transported D.P. to a treatment facility "without notifying or seeking consent from" P.S. Compl. ¶¶ 293, 304. As

noted in the Motion to Dismiss, however, this allegation is refuted by P.S.' own pleading. The Complaint explicitly alleges that "P.S. was called and told that D.P. would be taken for an involuntary examination under the Baker Act," and that P.S. responded by noting "that she had to go to her father's funeral and that D.P.'s aunt was caring for him." Compl. ¶ 91.[4]

Even if P.S.' due process claim were not refuted by her own pleading, P.S. she still cannot allege a "constitutionally-inadequate process." *Arrington*, 438 F.3d at 1347 (citation and quotation omitted). As noted in the Motion to Dismiss, "a careful balancing of the interests at stake" makes clear that P.S. suffered no deprivation of procedural due process, because a reasonable officer would have concluded that D.P. posed a threat to himself and others, thus warranting intervention under the Baker Act. *Kearney*, 329 F.3d at 1297.

CONCLUSION

For the reasons set forth above and in the Motion to Dismiss, plaintiffs have not and cannot state a legally sufficient cause of action. Accordingly, plaintiffs' claims against Officer Margolis should be dismissed with prejudice.

Respectfully submitted, this 30th day of September, 2021

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[4] P.S. now claims that she "was notified [D.P.] was being involuntarily examined but her consent was not sought." ECF No. 50, p. 4. But this purported distinction is irrelevant, as the Complaint asserts the basis for the alleged due process deprivation is that Officer Margolis "transported D.P. to a treatment facility "without notifying or seeking consent from" P.S. Compl. ¶¶ 293, 304 (emphasis added).

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