No. 22-912

In the Supreme Court of the United States

JAMES KING, PETITIONER

v.

DOUGLAS BROWNBACK, ET AL.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

BRIEF FOR THE RESPONDENTS IN OPPOSITION

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QUESTION PRESENTED

The Federal Tort Claims Act (FTCA), 28 U.S.C. 1346(b), 2671 *et seq.*, waives the sovereign immunity of the United States and creates a cause of action for damages for certain torts committed by federal employees. The FTCA also imposes a judgment bar, which provides that "[t]he judgment in an action under section 1346(b) of this title shall constitute a complete bar to any action by the claimant, by reason of the same subject matter, against the employee of the government whose act or omission gave rise to the claim." 28 U.S.C. 2676. The question presented is whether, after a court has entered judgment on an FTCA claim, the judgment bar applies to claims against individual officers asserted in the same complaint.

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OPINIONS BELOW

The opinion of the court of appeals (Pet. App. 1a-22a) is reported at 49 F.4th 991. The order of the court of appeals denying rehearing en banc (Pet. App. 135a-136a) is unreported.

JURISDICTION

The judgment of the court of appeals was entered on September 21, 2022. A petition for rehearing was denied on December 19, 2022 (Pet. App. 136a). The petition for a writ of certiorari was filed on March 17, 2023. The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

STATEMENT

1. The Federal Tort Claims Act (FTCA) waives the sovereign immunity of the United States, creates a cause of action for damages, and confers exclusive

federal-court jurisdiction for claims that fall within the statute's terms. See 28 U.S.C. 1346(b)(1); see also *FDIC* v. *Meyer*, 510 U.S. 471, 477 (1994). The remedy provided by the FTCA is generally "exclusive of any other civil action or proceeding for money damages by reason of the same subject matter against the employee whose act or omission gave rise to the claim." 28 U.S.C. 2679(b)(1). But that limitation "does not extend or apply to a civil action * * * which is brought for a violation of the Constitution." 28 U.S.C. 2679(b)(2). And while the FTCA includes a broad exception for intentional torts, it makes an exception to that exception for claims of "assault, battery, false imprisonment, false arrest, abuse of process, or malicious prosecution" arising out of the "acts or omissions of investigative or law enforcement officers." 28 U.S.C. 2680(h).

Thus, a plaintiff who alleges that a federal law-enforcement agent committed one of the specified state-law torts *and* a constitutional violation has multiple remedial options. He may plead an FTCA claim against the United States. He may also plead—in addition to, or in place of, the FTCA claim—an individual-capacity claim against the employee. See *Bivens* v. *Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971).

A plaintiff's "strategic choices" in selecting a cause of action have consequences. *Manning* v. *United States*, 546 F.3d 430, 435 (7th Cir. 2008), cert. denied, 558 U.S. 1011 (2009). A plaintiff who litigates an FTCA claim to judgment will be subject to its judgment bar, which provides that "[t]he judgment in an action under section 1346(b) of this title shall constitute a complete bar to any action by the claimant, by reason of the same subject matter, against the employee of the government

whose act or omission gave rise to the claim." 28 U.S.C. 2676. The judgment bar ensures that a plaintiff who "receives a judgment (favorable or not) in an FTCA suit * * * generally cannot proceed with a suit against an individual employee based on the same underlying facts." *Simmons* v. *Himmelreich*, 578 U.S. 621, 625 (2016). The statute thereby "prevents unnecessarily duplicative litigation" after an FTCA claimant has had "a fair chance to recover damages for his" alleged injury. *Id.* at 629-630.

2. This case arises from a violent encounter between petitioner and respondents, who were law-enforcement officers and members of a federal task force who mistook petitioner for a fugitive. Pet. App. 29a. Petitioner asserted claims against the United States under the FTCA and against respondents under the implied cause of action recognized by *Bivens*, *supra.* Pet. App. 29a. The district court rejected petitioner's *Bivens* claims on qualified-immunity grounds, *id.* at 30a, and his FTCA claims because (among other things) petitioner's complaint "did not present enough facts to state a plausible claim to relief," *ibid.* The court entered judgment for defendants. *Id.* at 134a.

Petitioner appealed his *Bivens* claims against respondents, but expressly waived his right to appeal the adverse FTCA judgment. See Pet. C.A. Br. 18 n.5. In light of that now-final FTCA judgment, respondents argued that the FTCA's judgment bar precluded petitioner's individual-capacity claims, see 28 U.S.C. 2676. A divided panel of the court of appeals declined to apply the judgment bar on the rationale that the district court's judgment on the FTCA claim "was not a disposition on the merits." Pet. App. 56a. The majority further found that there were material disputes of fact over

whether respondents were entitled to qualified immunity, *id.* at 58a-82a, and reversed the district court's grant of summary judgment on the *Bivens* claims, *id.* at 86a. Judge Rogers dissented on the ground that the judgment bar precluded petitioner's *Bivens* claims. *Id.* at 87a.

This Court unanimously reversed. Pet. App. 26a-37a. The Court observed that the district court "passed on the substance of [petitioner's] FTCA claims" when it "ruled that the FTCA count in [petitioner's] complaint did not state a claim, because even assuming the complaint's veracity, the officers used reasonable force, had probable cause to detain [petitioner], and otherwise acted within their authority." *Id.* at 34a; see *id.* at 33a-34a. The fact that the district court's merits ruling also deprived it of jurisdiction over the FTCA claims did not persuade the Court otherwise, since "in the unique context of the FTCA, all elements of a meritorious claim are also jurisdictional." *Id.* at 35a. The Court therefore concluded that the district court's "order was a judgment on the merits of the FTCA claims that can trigger the judgment bar." *Id.* at 37a.

Petitioner also argued that the judgment bar does not apply to a *Bivens* claim brought in the same lawsuit as an FTCA claim, but rather is limited to a *Bivens* claim brought in a separate lawsuit. Pet. App. 32a n.4. The Court declined to address that question because the court of appeals had not addressed it, instead "leav[ing] it to the Sixth Circuit to address [petitioner's] alternative arguments on remand." *Ibid.* Justice Sotomayor concurred, see *id.* at 38a-43a, to express her view that petitioner's alternative argument warranted "much closer analysis," *id.* at 43a, while recognizing that "[t]here are, of course, counterarguments," *id.* at 42a.

3. On remand, petitioner urged the court of appeals to adopt the alternative argument that he had raised before this Court. Petitioner conceded that the argument was foreclosed by circuit precedent. Pet. C.A. Remand Br. 46; see *Harris* v. *United States*, 422 F.3d 322, 334 (6th Cir. 2005) ("In accordance with the consistent application of the judgment bar over the fifty years since its enactment, we have held that the provision applies even when 'the claims were tried together in the same suit and the judgments were entered simultaneously.'") (brackets and citation omitted). But petitioner contended that *Harris* had been impliedly overruled by three decisions of this Court. Pet. C.A. Remand Br. 46-49.

Rejecting that argument, the panel majority held that "the language in [the cited] cases is not directly applicable to the issue in this case, as [respondents] pointed out, and [petitioner's] reply brief did not further address the issue." Pet. App. 6a. The majority therefore concluded that it was bound by *Harris*, which "discussed the caselaw, FTCA statutory history, and equitable principles and proceeded to hold squarely that the FTCA judgment bar applies to other claims brought in the same lawsuit." *Id.* at 5a-6a. Judge Clay dissented on the ground that this Court had impliedly overruled *Harris*. *Id.* at 9a-22a.

The court of appeals denied rehearing en banc. Pet. App. 135a-136a. No judge requested a vote on the petition, though Judge Clay would have granted rehearing. See *id.* at 136a.

ARGUMENT

The court of appeals correctly held that the FTCA judgment bar applied to petitioner's individual-capacity claims once the district court entered and petitioner

declined to appeal the judgment against him on his FTCA claims. That holding does not conflict with any decision of this Court. And no court of appeals has ever accepted petitioner's novel construction of the judgment bar, which would render the bar categorically inapplicable if the plaintiff files an individual-capacity suit and FTCA action in the same lawsuit. The petition for a writ of certiorari should be denied.

1. The court of appeals' decision is correct. The judgment bar states that an FTCA judgment is "a complete bar to any action by the claimant" against the federal employee whose conduct was at issue in the FTCA action. 28 U.S.C. 2676. The judgment bar's text and purpose make clear that it applies to claims within a single action, and petitioner's contrary arguments are unpersuasive.

a. The plain text of the judgment bar covers all claims for relief against a federal employee arising out of the same subject matter once a plaintiff's FTCA claim has gone to judgment. On its face, the statute makes no distinction between individual-capacity claims brought in the same lawsuit or a subsequent lawsuit, instead referring comprehensively to "*any* action." 28 U.S.C. 2676 (emphasis added). As this Court has often remarked, the term "'any'" connotes "a broad meaning." *Ali* v. *Federal Bureau of Prisons*, 552 U.S. 214, 218-219 (2008) (citation and emphasis omitted); see, *e.g.*, *Citizens' Bank* v. *Parker*, 192 U.S. 73, 81 (1904) ("The word *any* excludes selection or distinction. It declares the [subject] without limitation.").

Petitioner objects that Section 2676 bars any "'action'"—a term that purportedly "refers to the whole of the lawsuit"—rather than any "claim[]." Pet. 17 (citation omitted); see *ibid.* (defining a "claim" as "the part

of a complaint in a civil action specifying what relief the plaintiff asks for") (citation omitted). But even assuming that petitioner's narrow understanding of the term "action" were correct, the judgment bar would still apply in this case by its literal terms. Once the district court entered judgment on petitioner's FTCA claims and petitioner declined to appeal that ruling, the "action" was "complete[ly] bar[red]" from proceeding further. 28 U.S.C. 2676. Specifically, the only remaining claims in the action—petitioner's *Bivens* claims—were precluded. To put the matter another way: "By acting as a bar to *any* action, § 2676 bars the claims *within* that action." *Manning*, 546 F.3d at 434.

In any event, petitioner's strict dichotomy between "actions" and "claims" is misplaced. In 1946, when the FTCA was enacted, the term "action" meant a "legal and formal demand of one's right from another person or party made and insisted on in a court of justice." *Black's Law Dictionary* 41 (3d ed. 1933); see, *e.g.*, *Bouvier's Law Dictionary* 41 (William Edward Baldwin ed., 1934) (similar); *Cyclopedic Law Dictionary* 23 (3d ed. 1940) (similar). That broad definition encompassed a particular demand for relief against an individual federal employee that was pleaded in the same lawsuit as an FTCA claim. Contemporaneous sources used the term "claim" similarly. See, *e.g.*, *Cyclopedic Law Dictionary* 181 (defining "claim" as "[t]he assertion of a liability to the party making it to do some service or pay a sum of money"); *United States* v. *Cohn*, 270 U.S. 339, 345 (1926) (explaining that "the word 'claim' may sometimes be used in the broad juridical sense of 'a demand of some matter as of right made by one person upon another, to do or to forbear to do some act or thing as a matter of duty' ") (citation omitted).

The text of the judgment bar itself refutes petitioner's asserted dichotomy by using the terms "action" and "claim" interchangeably. Section 2676 provides that "[t]he judgment in an *action* under [the FTCA]" constitutes a complete bar to any action against the employee "whose act or omission gave rise to the [FTCA] *claim*." 28 U.S.C. 2676 (emphases added).

The breadth of the judgment bar's text reflects its purposes. The judgment bar has been a feature of the FTCA since its inception, see Pub. L. No. 79-601, ch. 753, Tit. IV, § 410(b), 60 Stat. 842, 844, and is a critical part of the FTCA's remedial compromise. The FTCA waived the federal government's sovereign immunity so that claimants could sue a solvent and deep-pocketed defendant. But the judgment bar gives plaintiffs a choice: if a claimant elects to pursue an FTCA remedy against the United States, then the judgment on that claim will resolve the controversy completely. See *United States* v. *Gilman*, 347 U.S. 507, 512 n.2 (1954). The provision thus protects federal employees and the United States from having to defend multiple claims arising from the same incident once an FTCA claim has been conclusively resolved. See *Will* v. *Hallock*, 546 U.S. 345, 354 (2006). Because the burdens of litigation arise whether or not a claimant has pleaded an individual claim in the same lawsuit or in a separate lawsuit, the judgment bar's text does not distinguish between simultaneous and sequential claims.

Petitioner's contrary interpretation is detached from the judgment bar's basic function and common sense. Petitioner appears to concede (Pet. 16 & n.9) that his *Bivens* claims would be barred if he had waited to bring them until after his FTCA action had been resolved. At that point, the district court's adverse judgment on

petitioner's FTCA claims plainly would have prevented a subsequent *Bivens* suit. It should make no difference that petitioner brought his FTCA and *Bivens* claims together, and the court issued judgment against him on the FTCA claims while the *Bivens* claims were also pending. When petitioner declined to appeal the adverse judgment on his FTCA claims, that judgment became final. The further litigation that petitioner seeks to pursue in this case would be "duplicative," *Simmons* v. *Himmelreich*, 578 U.S. 621, 629 (2016), because the government would be required to defend the *Bivens* claims after having litigated the same factual allegations to final judgment on the FTCA claims.

b. Petitioner contends (Pet. 13-19) that the court of appeals' decision is inconsistent with three decisions of this Court, which, in his view, align the judgment bar with common-law principles of preclusion. The court of appeals correctly held that petitioner's interpretation of those decisions is mistaken.

Petitioner first cites *Will*, *supra*. Pet. 25; see *Will*, 546 U.S. 345. But that decision addressed only a single question: whether a district court's refusal to apply the judgment bar is immediately appealable under the collateral-order doctrine. *Will*, 546 U.S. at 355. The case did not present the question whether the judgment bar applies to individual-capacity claims brought in the same lawsuit as FTCA claims because the plaintiffs there had brought their individual and FTCA claims in different lawsuits. *Id.* at 348.

Petitioner next invokes *Simmons*, *supra*. Pet. 28; see *Simmons*, 578 U.S. 621. That decision likewise addressed a different question: whether the judgment bar applies to claims "explicitly exempted from the FTCA due to their inclusion in the 'Exceptions' section of the

statute." Pet. App. 7a (citation omitted). The case did not present the question at issue here because, like the *Will* claimants, the *Simmons* claimants had also brought their individual and FTCA claims in separate lawsuits. 578 U.S. at 624.

Finally, petitioner cites *Brownback*, the Court's prior decision in this case. Pet. 29; see Pet. App. 26a-37a. But this Court explicitly "le[ft] it to the Sixth Circuit to address [petitioner's present] argument[ ] on remand," *id.* at 32a n.4, "which it would have been unlikely to have done if it thought its precedent clearly answered the question," *id.* at 6a. The Court made clear that "[t]he parties['] disagree[ment] about how much the judgment bar expanded on common-law preclusion" is "not relevant to [its] decision." *Id.* at 32a n.5.

Petitioner appears to acknowledge, see Pet. C.A. Reh'g Pet. 12-13, that none of the three decisions he cites directly addressed the question presented here. Petitioner nevertheless contends that those decisions impliedly overruled not only Sixth Circuit precedent, but also the holdings of every court of appeals to address the issue, see pp. 12-14, *infra*. He contends that the Court effected this revolution in FTCA practice by noting that the judgment bar is "roughly analogous" to the common-law doctrine of claim preclusion, *Simmons*, 578 U.S. at 630 n.5, and functions in "much the same way," *Will*, 546 U.S. at 354. And he further contends (Pet. 15) that common-law claim preclusion "never applies to claims raised in the same action."

At the outset, petitioner dramatically overreads the three decisions he cites, which do not equate the judgment bar with common-law claim preclusion in every particular. Observing that the "judgment bar was drafted against the backdrop doctrine of res judicata,"

Pet. 14 (quoting Pet. App. 32a), is not the same as saying that the two are "functionally identical," Pet. 13. To the contrary, this Court's decisions are best read to support the *government's* position on the question presented here. As the Court explained in *Will*, in language equally applicable in this case: "If a *Bivens* action alone is brought, there will be no possibility of a judgment bar, nor will there be so long as a *Bivens* action against officials and a Tort Claims Act against the Government are pending simultaneously (as they were for a time here)." 546 U.S. at 354. But once judgment has been entered on the FTCA claims, as in this case, such that the claims are no longer "pending simultaneously," the judgment bar applies. *Ibid.* Moreover, the Court observed in *Simmons* that the judgment bar reflects Congress's decision that, when an FTCA plaintiff has "simply failed to prove his claim, it would make little sense to give [him] a second bite at the money-damages apple by allowing suit against the employees." 578 U.S. at 629-630. The same logic applies in the circumstances of this case.

In any event, petitioner's attempt to equate the judgment bar with claim preclusion founders on the plain text. As noted, the judgment bar extends to "*any* action" against the relevant federal employee arising out of the same subject matter as the FTCA claim. 28 U.S.C. 2676 (emphasis added). In contrast, the entire linchpin of petitioner's argument is that, by 1946, it was well-settled that common-law preclusion principles barred only "a *subsequent* action on the claim." Restatement (First) of Judgments § 45 cmt. b (1942) (emphasis added); see Pet. 15-16 & n.8; see also, *e.g.*, *Cromwell* v. *County of Sac*, 94 U.S. 351, 352 (1876) (stating

that res judicata "constitutes an absolute bar to a subsequent action" or to "future proceedings").

Congress's decision to use the sweeping phrase "any action" in the judgment bar, 28 U.S.C. 2676—rather than the common-law formulation "subsequent action"—renders it "inconsequential" that petitioner chose to file his individual and FTCA actions "together in the same suit," *Serra* v. *Pichardo*, 786 F.2d 237, 241 (6th Cir.), cert. denied, 479 U.S. 826 (1986). "Had Congress intended to * * * narrow" the judgment bar in the way that petitioner suggests, it could easily have copied "similar limitations in" judicial decisions or common-law sources. *Millbrook* v. *United States*, 569 U.S. 50, 57 (2013) (addressing different aspect of FTCA). It did not do so. Because Congress in the FTCA presumably "says what it means and means what it says," that should be the end of the matter. *Simmons*, 578 U.S. at 627.

2. Petitioner urges (Pet. 12, 19-29) this Court to grant certiorari to resolve a purported conflict between the circuits over the question presented. But the circuits are united in their rejection of petitioner's argument that a claimant may sue the United States under the FTCA, litigate that claim to judgment, and then—win or lose—continue litigating individual-capacity claims against federal employees in the same lawsuit. See *White* v. *United States*, 959 F.3d 328, 333 (8th Cir. 2020) ("We join other circuits in holding that the FTCA's judgment bar provision precludes a *Bivens* claim regarding the same subject matter, even if the claims arose within the same suit."), cert. denied, 141 S. Ct. 1685 (2021); *Unus* v. *Kane*, 565 F.3d 103, 121-122 (4th Cir. 2009), cert. denied, 558 U.S. 1147 (2010); *Manning*, 546 F.3d at 434; *Harris,* 422 F.3d at 337; *Estate of*

Trentadue ex rel. Aguilar v. *United States*, 397 F.3d 840, 858-859 (10th Cir. 2005); *Rodriguez* v. *Handy*, 873 F.2d 814, 816 (5th Cir. 1989).

That consensus dates back to the judgment bar's earliest years. See *United States* v. *Lushbough*, 200 F.2d 717, 721 (8th Cir. 1952) ("The District Court, having awarded a judgment in favor of [plaintiff] in his action against the United States, could not in the face of the explicit provisions of the Act order judgment against [the individual federal employee] in favor of [plaintiff] in the same action."); see also *Gilman* v. *United States*, 206 F.2d 846, 848 & n.3 (9th Cir. 1953). And contrary to petitioner's contention (Pet. 19) that the courts of appeals are simply "repackaging the same superficial analysis," many of the cited decisions engaged with the arguments that petitioner now presents to the Court—and correctly rejected them. See, *e.g.*, *Unus*, 565 F.3d at 121-122; *Manning*, 546 F.3d at 433-436; *Harris,* 422 F.3d at 333-337.

The Ninth Circuit applies the judgment bar differently, but its interpretation of the statute likewise forecloses plaintiff's interpretation. In that circuit, the judgment bar does not apply within the same action if the United States prevails on the FTCA claim. See *Fazaga* v. *FBI*, 965 F.3d 1015, 1064 (9th Cir. 2020), rev'd on other grounds, 142 S. Ct. 1051 (2022); *Kreines* v. *United States*, 959 F.2d 834, 838 (9th Cir. 1992). But the Ninth Circuit *does* apply the bar within a single action when the *plaintiff* prevails on the FTCA claim. See *Arevalo* v. *Woods*, 811 F.2d 487, 490 (9th Cir. 1987). Petitioner does not embrace that asymmetrical result, see Pet. 12—and understandably so, for it is inconsistent with this Court's recognition that the judgment bar applies "once a plaintiff receives a judgment (favorable or

not) in an FTCA suit." *Simmons*, 578 U.S. at 625; accord *Will*, 546 U.S. at 354 (explaining that "the judgment bar can be raised" after an FTCA action "has been resolved in the Government's favor").

In short, in the more than 75 years since the judgment bar was enacted, no court of appeals has accepted petitioner's contention that the judgment bar is categorically inapplicable to individual-capacity claims brought in the same lawsuit as FTCA claims. Moreover, as petitioner acknowledges (Pet. 19), the narrow conflict between the Ninth Circuit and all other circuits to address the question has existed for 30 years. During that time, this Court has repeatedly denied petitions for writs of certiorari presenting the same or similar questions. See, *e.g.*, *White* v. *United States*, 141 S. Ct. 1685 (2021) (No. 20-587); *Unus* v. *Aarons*, 558 U.S. 1147 (2010) (No. 09-294); *Manning* v. *United States*, 558 U.S. 1011 (2009) (No. 08-1595). It should do the same here.

Petitioner offers no other compelling basis for review. He suggests (Pet. 27-28, 30) that the Court's intervention is warranted to avoid incentivizing claimants to sue individual employees before deciding whether to sue the United States under the FTCA. But that outcome results under any interpretation: claimants who wish to avoid the judgment bar have always been required to either bring "a *Bivens* action alone" or else maintain their *Bivens* and FTCA actions "pending simultaneously." *Will*, 546 U.S. at 354. For even on petitioner's interpretation, see, *e.g.*, Pet. 15-16, a plaintiff who sues under the FTCA and litigates that claim to judgment will be barred from bringing a later action against individual officers arising out of the same facts. And regardless, significant countervailing incentives discourage claimants from bringing standalone *Bivens*

claims before FTCA claims, including the FTCA's two-year statute of limitations, 28 U.S.C. 2401(b), and the ability to recover from the judgment fund under the FTCA, see 28 U.S.C. 2414; 31 U.S.C. 1304(a)(3)(A).

In reality, it is *petitioner's* interpretation that would produce untoward results by inviting "duplicative" litigation. *Simmons*, 578 U.S. at 629. In the face of petitioner's "simpl[e] fail[ure] to prove his [FTCA] claim[s]," it makes "little sense" to afford him "a second bite at the money-damages apple by allowing suit against the employees" based on identical facts. *Id.* at 629-630. Petitioner's approach would apparently even allow future claimants to win a judgment under the FTCA and then continue pursuing individual federal employees for additional damages from the same incident—including punitive damages, which are unavailable in an action under the FTCA, 28 U.S.C. 2674; see *Carlson* v. *Green*, 446 U.S. 14, 22 (1980)—so long as the claimants bring their FTCA and individual-capacity claims together. That is precisely the kind of result that Congress enacted the judgment bar to avoid.

CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted.

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