

United States Court of Appeals
For the Eighth Circuit

No. 25-2503

The Iowa Farm Sanctuary, An Iowa nonprofit corporation; Shawn Camp,

Plaintiffs - Appellants,

v.

University of Missouri Veterinary Health Center; Curators of the University of
Missouri, Columbia; Joan Coates, Dr., In her official and individual capacity,

Defendants - Appellees,

Jane Doe, Dr., In her official and individual capacity,

Defendant,

Dr. Celeste Morris, in her official and individual capacity,

Defendant - Appellee.

Appeal from United States District Court
for the Western District of Missouri - Jefferson City

Submitted: May 13, 2026

Filed: September 3, 2026

Before COLLOTON, Chief Judge, SHEPHERD and KOBES, Circuit Judges.

COLLTON, Chief Judge.

Employees from the Iowa Farm Sanctuary delivered six injured sheep to a veterinary hospital. At the direction of the owner of the sheep, and without consent from the Farm Sanctuary, medical staff from the hospital euthanized four of the sheep. The Farm Sanctuary and its director sued the Curators of the University of Missouri, the University of Missouri Veterinary Health Center, and various hospital personnel in their individual and official capacities. The plaintiffs allege that the defendants' actions constituted a denial of procedural and substantive due process under the Fourteenth Amendment, and an unreasonable seizure under the Fourth Amendment. The district court^{*} ruled that the complaint failed to state a claim, and granted the defendants' motion to dismiss. We affirm.

I.

We recite the facts as alleged in the complaint. On June 25, 2023, a tractor-trailer containing 200 sheep crashed on a highway in Missouri. Highway patrol officers arrived at the site, and arranged for transportation of approximately 150 living sheep to a nearby holding facility. Staff from the Iowa Farm Sanctuary traveled to the crash site, and an officer informed the staff that they could take possession of the critically injured sheep located at the facility.

The Farm Sanctuary's staff arrived at the holding facility and took possession of six sheep. The director of the Farm Sanctuary transported the sheep to the University of Missouri Veterinary Health Center, a hospital that provides veterinary care. The director paid \$1,000 as a deposit for veterinary services. Late that night,

^{*}The Honorable M. Douglas Harpool, United States District Judge for the Western District of Missouri.

the director authorized the euthanasia of two of the six sheep because they were critically injured.

On June 26, medical staff from the hospital requested payment for additional veterinary services. The director of the Farm Sanctuary agreed to pay for the additional services if the hospital staff provided an update on the health of the four remaining sheep. The staff refused to provide the requested information because the owner of the sheep had arrived at the hospital, and the director was not the owner.

On June 28, employees from the Farm Sanctuary arrived at the hospital and attempted to inspect the sheep, but the hospital staff denied them access. The hospital staff refused to provide health and treatment records for the sheep. The next day, the Farm Sanctuary and the director of the organization sued the owner of the sheep in Missouri state court, seeking return of the sheep through replevin.

On July 3, the owner's attorney informed the Farm Sanctuary that the owner had instructed the hospital staff to euthanize the four remaining sheep on June 26, and the Farm Sanctuary alleges that the hospital staff euthanized the sheep at the owner's instruction. The plaintiffs' action for replevin was dismissed after they discovered that the sheep were no longer alive.

The Farm Sanctuary and its director sued the Curators of the University of Missouri, *see* Mo. Rev. Stat. § 172.020, the hospital, and certain hospital personnel in their individual and official capacities under 42 U.S.C. § 1983. The plaintiffs seek damages, injunctive relief, and declaratory relief. The plaintiffs allege that they enjoyed a property interest under the lien laws of Missouri, and that the defendants unlawfully failed to provide notice and an opportunity for a hearing before euthanizing the sheep. The plaintiffs allege that the defendants' actions constituted a denial of procedural and substantive due process under the Fourteenth Amendment, and an unreasonable seizure under the Fourth Amendment.

The defendants moved to dismiss and argued, among other things, that the plaintiffs lacked standing to seek injunctive relief, that the plaintiffs failed to state a plausible claim for relief, and that the plaintiffs' claims against the University of Missouri are barred by the Eleventh Amendment.

The district court determined that the lien laws of Missouri have "provided an adequate remedy for Plaintiff's claimed loss and injury." The court concluded that the plaintiffs failed to state a claim upon which relief can be granted under § 1983, and granted the motion to dismiss. The court noted that the "Defendants raise a host of other arguments ranging from jurisdictional issues, immunities, and other related reasons why the case should be dismissed," but concluded that it was unnecessary to address those contentions.

We review the grant of a motion to dismiss *de novo*. *In re Crop Inputs Antitrust Litig.*, 172 F.4th 570, 576 (8th Cir. 2026). To survive a motion to dismiss, "a complaint must contain sufficient factual matter, accepted as true, to 'state a claim to relief that is plausible on its face.'" *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)).

II.

The plaintiffs seek damages and injunctive relief. A plaintiff must "demonstrate standing separately for each form of relief sought." *TransUnion LLC v. Ramirez*, 594 U.S. 413, 436 (2021) (internal quotation omitted). To establish standing to seek injunctive relief, a plaintiff must demonstrate that she "is immediately in danger of sustaining some direct injury as the result of the challenged official conduct." *City of Los Angeles v. Lyons*, 461 U.S. 95, 102 (1983) (internal quotation omitted). The "'threatened injury must be *certainly impending* to constitute injury in fact,'" and "'[a]llegations of *possible* future injury' are not sufficient" to establish standing. *Clapper v. Amnesty Int'l USA*, 568 U.S. 398, 409 (2013)

(alteration in original) (quoting *Whitmore v. Arkansas*, 495 U.S. 149, 158 (1990)) (emphases added in *Clapper*).

Within the section of the complaint labeled “Prayer For Relief,” the complaint states that the plaintiffs seek injunctive relief “[e]njoining Defendants to comply with all laws and statutes concerning disputed property interests and liens for the care of animals in Missouri,” and “[e]njoining Defendants to develop and implement training . . . to ensure compliance with all applicable statutes.” The plaintiffs allege that they have standing to seek injunctive relief because they are likely to suffer future injury from the euthanasia of an animal by the hospital personnel. The plaintiffs argue that the Farm Sanctuary is a first responder to freeway accidents involving farm animals, and that “the Sanctuary’s rescue and placement team regularly receives calls concerning animal rescue.” The plaintiffs maintain that they “conduct rescue activities . . . in proximity to University Defendants’ Veterinary Health Center.”

The plaintiffs’ theory of standing depends on a recurrence of the following chain of events: (1) an accident occurs and causes injury to an animal that requires medical care; (2) the plaintiffs arrive at the scene and lawfully take possession of the animal; (3) the plaintiffs transport the animal to the University of Missouri Veterinary Health Center; and (4) hospital personnel euthanize the animal without notice or consent of the plaintiffs. We conclude that this theory of standing, “which relies on a highly attenuated chain of possibilities, does not satisfy the requirement that threatened injury must be certainly impending.” *Clapper*, 568 U.S. at 410. We therefore affirm the dismissal of the claim for injunctive relief, but will convert the judgment to a dismissal without prejudice.

III.

The plaintiffs do have standing to seek damages. They allege that an injury in fact was caused by the defendants, and they seek relief that would redress the alleged injury.

The plaintiffs first challenge the dismissal of their claim alleging a denial of procedural due process. To state a claim, a plaintiff must show “a deprivation of life, liberty, or property without sufficient process.” *Hughes v. City of Cedar Rapids*, 840 F.3d 987, 994 (8th Cir. 2016). For purposes of the Due Process Clause, property “is an individual entitlement grounded in state law.” *Logan v. Zimmerman Brush Co.*, 455 U.S. 422, 430 (1982).

We agree with the plaintiffs that they had a lien under Missouri law, and that the lien constituted a property interest under the Due Process Clause. *See Mennonite Bd. of Missions v. Adams*, 462 U.S. 791, 798-99 (1983); *Ford Motor Credit Co. v. N.Y.C. Police Dep’t*, 394 F. Supp. 2d 600, 611 (S.D.N.Y. 2005). Animals that are lawfully impounded by a law enforcement officer may be placed in the care of an appropriate entity, and the entity is “entitled to a lien on the animal for the reasonable cost of the care of the animal.” Mo. Rev. Stat. § 430.165. The plaintiffs allege that a law enforcement officer impounded approximately 150 sheep, and placed six of the sheep in the custody of the plaintiffs. Am. Compl. ¶ 48. At that point, the plaintiffs had “a legitimate claim of entitlement” to a lien that was created by Missouri law. *See Bd. of Regents v. Roth*, 408 U.S. 564, 577 (1972).

The plaintiffs argue that their lien was destroyed when the hospital personnel euthanized the sheep. We assume for the sake of analysis that the lien was destroyed, and that this destruction constituted a deprivation of property. *See* 51 Am. Jur. 2d *Liens* § 62 (2026) (“The extinction of property against which a lien applies extinguishes the lien.”); *Armstrong v. United States*, 364 U.S. 40, 46-49 (1960); *United States v. Salerno*, 222 F. Supp. 664, 669 (D. Nev. 1963). We conclude, however, that the plaintiffs have failed to state a plausible procedural due process claim because the State of Missouri has provided an adequate post-deprivation remedy.

The rule of *Parratt v. Taylor*, 451 U.S. 527 (1981), and *Hudson v. Palmer*, 468 U.S. 517 (1984), is important to this case. *Parratt* held that after an inmate was

deprived of property due to “a random and unauthorized act by a state employee” who acted negligently, the inmate did not state a claim under the Due Process Clause where the State provided him “with the means by which he can receive redress for the deprivation.” 451 U.S. at 541, 543. In other words, the availability of post-deprivation process was sufficient to satisfy the Due Process Clause. *Hudson* applied the same rule in a case involving an intentional deprivation of property that was random and unauthorized. 468 U.S. at 519.

The procedural due process claim fails here because the State of Missouri has provided an adequate post-deprivation remedy. Under Missouri law, the plaintiffs were entitled to a lien on the sheep for the reasonable cost of the care of the sheep. *See* Mo. Rev. Stat. §§ 430.150, 430.165. The plaintiffs could seek to have the sheep “sold to satisfy” the lien. *Id.* § 430.160. Because the sheep were euthanized, however, the plaintiffs may seek to recover the amount of the “indebtedness on the account sued on.” *Id.* At oral argument, counsel for the plaintiffs acknowledged that the plaintiffs pursued an action under § 430.160 in state court against the owner of the sheep to recover the reasonable cost of the care of the sheep.

The plaintiffs argue that a remedy under § 430.160 would not be adequate because “the judgment would be limited to the putative owner,” and it “would not vindicate Farm Sanctuary Plaintiffs’ constitutional right to procedural due process . . . as against University Defendants.” We are not persuaded that the Due Process Clause requires the remedies preferred by the plaintiffs. The State has provided a remedy against the owner who directed the euthanization. “Although the state remedies may not provide the [plaintiffs] with all the relief which may have been available if [they] could have proceeded under § 1983, that does not mean that the state remedies are not adequate to satisfy the requirements of due process.” *Parratt*, 451 U.S. at 544.

The plaintiffs argue that the remedy provided by § 430.160 is inadequate because the litigation “would almost certainly amount to a lengthy and speculative process.” But “almost all litigation, whether conducted in a state or federal forum,

may be characterized as a lengthy and speculative process,” and we “should not reject the application of *Parratt* unless the remedy which an injured party may pursue in state court can readily be characterized as inadequate to the point that it is meaningless or nonexistent.” *Easter House v. Felder*, 910 F.2d 1387, 1406 (7th Cir. 1990) (en banc). Alleging that the litigation would “amount to a lengthy and speculative process” is not the equivalent of alleging that the remedy is meaningless or nonexistent.

The plaintiffs respond that this case is more like *Zinerman v. Burch*, 494 U.S. 113 (1990), which distinguished *Parratt* and *Hudson*. In *Zinerman*, a patient at a state hospital stated a due process claim by alleging that hospital personnel admitted him as a “voluntary” mental patient despite his incompetency to give informed consent. *Id.* at 138-39. The Court held that the case was not controlled by *Parratt* and *Hudson* for three basic reasons: (1) the deprivation of the plaintiff’s liberty was not “unpredictable”; (2) predeprivation process was not “impossible”; and (3) the hospital personnel could not characterize their conduct as “unauthorized.” *See id.* at 136-38.

We conclude that this case is comparable to *Parratt* and *Hudson* rather than *Zinerman*. First, the euthanasia of the sheep was unpredictable. In *Zinerman*, it was “hardly unforeseeable that a person requesting treatment for mental illness might be incapable of informed consent,” and “[a]ny erroneous deprivation [would] occur, if at all, at a specific, predictable point in the admission process—when a patient is given admission forms to sign.” *Id.* at 136. Here, even assuming that the State could anticipate that hospital personnel would euthanize animals without providing certain procedural safeguards, the State “‘cannot predict precisely’” when the deprivations will occur, so the State could not provide a meaningful hearing before a deprivation takes place. *Id.* (quoting *Parratt*, 451 U.S. at 541).

Second, predeprivation process was not possible here. In *Zinerman*, the deprivation might have been averted if the State had “limited and guided” the power

of hospital personnel to admit patients. *Id.* at 137. In contrast, the State of Missouri already limited the discretion of veterinary personnel to euthanize the sheep. The plaintiffs allege that under Mo. Rev. Stat. § 578.016.1(2) and other provisions, the defendants “had a clear, explicit, non-discretionary duty to comply with Missouri’s lien statutes and delay euthanizing the sheep until the property dispute had been resolved.” Am. Compl. ¶ 60. But the defendants “acted abruptly and summarily in their decision to euthanize the sheep.” *Id.* ¶ 66. Missouri law thus prescribed how the defendants were to act once they had possession of the sheep, but the defendants acted contrary to those limitations. Predeprivation process was therefore not possible here. *See Bogart v. Chapell*, 396 F.3d 548, 561-62 (4th Cir. 2005).

Third, the defendants’ conduct in this case was “unauthorized.” In *Zinermon*, the Court determined that the hospital personnel’s conduct was not unauthorized because “[t]he State delegated to them the power and authority to effect the very deprivation complained of.” 494 U.S. at 138. In contrast, Missouri law prohibited the defendants from euthanizing the sheep, and the “deprivation did not occur as a result of some established state procedure.” *Parratt*, 451 U.S. at 543. Rather, “the deprivation occurred as a result of the unauthorized failure of agents of the State to follow established state procedure.” *Id.*; *see Bogart*, 396 F.3d at 562.

For these reasons, we conclude that the State of Missouri has provided a post-deprivation remedy that is sufficient to satisfy the requirements of due process under the circumstances. The district court properly dismissed the plaintiffs’ procedural due process claim.

The *Parratt-Hudson* doctrine, however, does not govern the plaintiffs’ claims alleging an unreasonable seizure or a violation of substantive due process. *Williams-El v. Johnson*, 872 F.2d 224, 228-29 (8th Cir. 1989); *Guenther v. Holmgreen*, 738 F.2d 879, 882-83 (7th Cir. 1984). For these claims, “overlapping state remedies are generally irrelevant to the question of the existence of a cause of action under § 1983.” *Zinermon*, 494 U.S. at 124. Unlike a matter of procedural due process,

where a violation is not complete unless and until the State fails to provide due process, a constitutional violation under the Fourth Amendment or based on substantive due process “is complete when the wrongful action is taken.” *Id.* at 125.

To prevail on a substantive due process claim, the plaintiffs must show both that the defendants’ conduct “is conscience-shocking and that it violated a fundamental right” of the plaintiffs. *Van Orden v. Stringer*, 937 F.3d 1162, 1167 (8th Cir. 2019). A fundamental right is one that is “deeply rooted in this Nation’s history and tradition,” and “implicit in the concept of ordered liberty,” such that “neither liberty nor justice would exist if they were sacrificed.” *Washington v. Glucksberg*, 521 U.S. 702, 721 (1997) (internal quotations omitted). The plaintiffs must provide a “careful description” of the asserted fundamental right. *Id.* (internal quotation omitted).

We conclude that the complaint does not state a plausible substantive due process claim. The plaintiffs have not precisely identified their asserted fundamental right in their operative complaint or in their briefing on appeal. One section of the complaint is labeled “Violation of Substantive Due Process.” Within that section, the complaint alleges that the “Defendants’ actions were irrational, and resulted in a violation of Plaintiffs’ substantive due process rights.” Am. Compl. ¶ 108. The complaint further alleges that the defendants “offended judicial notions of fairness and human dignity when they denied information to Plaintiffs regarding the wellbeing of the sheep.” *Id.* ¶ 102. But these vague and conclusory allegations do not set out a “careful description” of an asserted fundamental right that is deeply rooted in the history and tradition of the Nation.

Nor have the plaintiffs shown that the defendants’ conduct was “so egregious, so outrageous, that it may fairly be said to shock the contemporary conscience.” *County of Sacramento v. Lewis*, 523 U.S. 833, 847 n.8 (1998). We cannot say that the defendants, in euthanizing animals that were suffering from injuries, conducted themselves in a manner that meets this standard. The hospital personnel euthanized

the sheep at the direction of the owner, and were not “so inspired by malice or sadism . . . that it amounted to a brutal and inhumane abuse of official power literally shocking to the conscience.” *Truong v. Hassan*, 829 F.3d 627, 631 (8th Cir. 2016) (internal quotation omitted).

Finally, the plaintiffs allege that the conduct of the defendants violated their rights under the Fourth Amendment by making an unreasonable seizure. The plaintiffs allege that they had “a valid property interest in the six impounded sheep,” and that the defendants “unreasonably seiz[ed] and destroy[ed]” the four sheep when they euthanized them. The complaint further alleges that the plaintiffs “suffered an unlawful seizure and deprivation of the sheep.”

To challenge the reasonableness of a seizure, the plaintiffs must have a “cognizable Fourth Amendment interest.” *United States v. Bettis*, 946 F.3d 1024, 1027 (8th Cir. 2020) (internal quotation omitted). The plaintiffs concede that they did not own the sheep; instead, they argue that their lien interest granted them a sufficient possessory interest to bring a Fourth Amendment claim.

Assuming that the plaintiffs could assert a Fourth Amendment claim based on their status as lienholders, we conclude that the seizure was reasonable. Reasonableness is the “ultimate touchstone of the Fourth Amendment.” *Brigham City v. Stuart*, 547 U.S. 398, 403 (2006). The euthanasia of an animal may constitute a seizure, but such a seizure is not unreasonable when the animal is suffering from injuries and is euthanized based on direction and consent from the animal’s owner. *See Bulfin v. Rainwater*, 104 F.4th 1032, 1039-40 (8th Cir. 2024); *Maldonado v. Municipality of Barceloneta*, 682 F. Supp. 2d 109, 131 (D.P.R. 2010) (“[A] warrantless seizure of property does not contravene the Fourth Amendment if the owner consents to the seizure.”).

Having concluded that the complaint fails to state a claim, we need not address the defendants’ sovereign immunity argument under the Eleventh Amendment on

behalf of the Curators of the University. *See Gordon v. City of Kansas City*, 241 F.3d 997, 1005 n.7 (8th Cir. 2001).

The judgment of the district court is affirmed, except that the dismissal of the claim for injunctive relief is converted to a dismissal without prejudice.
