

SUPPLEMENT

Please replace the third full paragraph on page 70 of the December 2008 Section 1983 outline with the following:

Heck is only triggered once a person has been convicted. See [*Wallace v. Kato*, 549 U.S. 384, 127 S. Ct. 1091, 1097-98 \(2007\)](#).

Heck applies to civil detainees under California's Sexually Violent Predators Act. See [*Huftile v. Miccio-Fonseca*, 410 F.3d 1136, 1139-40 \(9th Cir. 2005\)](#) (explaining that, unlike the exhaustion requirement of the PLRA which does not apply to civil detainees, the habeas statute is not textually limited to prisoners).