

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Coffer v. Crayton

Coffer · No. 1:25-cv-00317-BAM (PC) · Decided March 18, 2025

SUMMARY

The United States District Court for the Eastern District of California transferred Jonathan Christopher Coffer’s 42 U.S.C. § 1983 action to the Northern District of California. The court determined that the claims appeared to arise in Monterey County and transferred the case under 28 U.S.C. § 1406(a) in the interest of justice.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 18, 2025
DOCKET	1:25-cv-00317-BAM (PC)
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff filed a prisoner civil-rights action under 42 U.S.C. § 1983 in the Eastern District of California. The court determined that the claims appeared to arise in Monterey County, within the Northern District of California, and transferred the action under 28 U.S.C. § 1406(a).
PRECEDENTIAL VALUE	unknown
PARTIES	Jonathan Christopher Coffer v. Crayton, et al.

TOPICS

- venue
- civil procedure
- section 1983

PRACTICE AREAS

- Civil procedure
- Civil rights
- Prisoner litigation

QUESTIONS PRESENTED

1. Whether venue was proper in the Eastern District of California when the claims appeared to arise in Monterey County, which is located in the Northern District of California.
2. Whether the action should be transferred to the Northern District of California in the interest of justice under 28 U.S.C. § 1406(a).

HOLDINGS

1. Because the claims appeared to have arisen in Monterey County, the action should have been filed in the Northern District of California rather than the Eastern District of California.
2. A federal court may transfer a complaint filed in the wrong district to the correct district in the interest of justice, and this action was transferred to the Northern District of California.

KEY QUOTATIONS

“In the interest of justice, a federal court may transfer a complaint filed in the wrong district to the correct district.” (at 2)

FACTUAL BACKGROUND

Plaintiff is a state prisoner who filed a civil-rights action under 42 U.S.C. § 1983. The complaint's claims appeared to arise in Monterey County, California. Because Monterey County is located in the Northern District of California, the court concluded that the action had been filed in the wrong federal district.

PROCEDURAL HISTORY

Jonathan Christopher Coffey, a state prisoner proceeding pro se, filed a civil-rights complaint in the Eastern District of California. The court concluded that venue appeared proper in the Northern District of California because the claims arose in Monterey County and transferred the case in the interest of justice.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter is transferred to the United States District Court for the Northern District of California.

CASES CITED

- *Ravelo Monegro v. Rosa*, 211 F.3d 509, 512 (9th Cir. 2000)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF
CALIFORNIA 10 11 JONATHAN CHRISTOPHER COFFEY, Case No. 1:25-cv-00317-BAM
(PC) 12 Plaintiff, ORDER TRANSFERRING CASE TO THE NORTHERN DISTRICT OF
CALIFORNIA 13 v. 14 CRAYTON, et al., 15 Defendants. 16 17 Plaintiff Jonathan Christopher

Coffer ("Plaintiff"), a state prisoner proceeding pro se, has filed a civil rights action pursuant to 42 U.S.C. § 1983.

(ECF No. 1.) The federal venue statute requires that a civil action, other than one based on diversity jurisdiction, be brought only in "(1) a judicial district where any defendant resides, if all defendants are residents of the State in which the district is located, (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of the property that is the subject of the action is situated, or (3) if there is no district in which an action may otherwise be brought as provided in this section, any judicial district in which any defendant is subject to the court's personal jurisdiction with respect to such action." 28 U.S.C. § 1391(b).

In this case, the claims appear to have arisen in Monterey County, which is in the Northern District of California. Therefore, Plaintiff's claim should have been filed in the United States District Court for the Northern District of California.

In the interest of justice, a federal court may transfer a complaint filed in the wrong district to the correct district. See 28 U.S.C. § 1406(a); *Ravelo Monegro v. Rosa*, 211 F.3d 509, 512 (9th Cir. 2000). Accordingly, IT IS HEREBY ORDERED that this matter is transferred to the United States District Court for the Northern District of California. IT IS SO ORDERED.

Dated: March 17, 2025 /s/ Barbara A. McAuliffe _ UNITED STATES MAGISTRATE JUDGE