

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Tahtiana Jade Brown v. LucidWorks, et al.

Brown v. LucidWorks · No. 2:25-cv-00607-DC-CKD (PS) · Decided February 26, 2025

SUMMARY

The magistrate judge recommends denying plaintiff Tahtiana Brown’s motion for a temporary restraining order and preliminary injunction seeking to halt a Workers’ Compensation Appeals Board proceeding. The recommendation concludes that the motion is procedurally defective under Eastern District of California Local Rule 231 and that plaintiff failed to establish irreparable harm or a likelihood of success on the merits. The court also questions subject-matter jurisdiction because HIPAA provides no private cause of action and the complaint does not clearly establish another federal question.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Carolyn K. Delaney
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	February 26, 2025
DOCKET	2:25-cv-00607-DC-CKD (PS)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order and preliminary injunction to enjoin an upcoming Workers’ Compensation Appeals Board trial. The magistrate judge issued findings and recommendations that the motion be denied and advised the parties of the procedure for filing objections.
STANDARD OF REVIEW	Temporary restraining order and preliminary injunction requests are evaluated under substantially identical standards. The movant must establish likelihood of success on the merits, likelihood of irreparable harm absent relief, that the balance of equities favors relief, and that an injunction is in the public interest. The court may also apply the Ninth Circuit sliding-scale test, under which a stronger showing on one element may offset a weaker showing on another.

PRECEDENTIAL VALUE	nonprecedential findings and recommendations; precedential status unknown
PARTIES	Tahtiana Jade Brown v. LucidWorks, et al.

TOPICS

injunctions civil procedure subject matter jurisdiction hipaa medical records privacy

PRACTICE AREAS

civil procedure injunctive relief federal jurisdiction health law medical records privacy

QUESTIONS PRESENTED

1. Whether plaintiff's motion for a temporary restraining order and preliminary injunction should be denied for failing to comply with the Eastern District of California's procedural requirements for temporary restraining orders.
2. Whether plaintiff established a likelihood of success on the merits and likelihood of irreparable harm sufficient to obtain a temporary restraining order or preliminary injunction.
3. Whether plaintiff's workers' compensation proceeding was removable under 28 U.S.C. § 1445(c).
4. Whether plaintiff's complaint established a federal question or other basis for subject matter jurisdiction, including through its HIPAA claim.

HOLDINGS

1. The motion was procedurally defective because plaintiff did not file the required briefing, affidavit concerning irreparable injury, affidavit concerning notice or justification for dispensing with notice, or proposed order. Failure to comply with the local rule independently justified denial of the requested temporary restraining order.
2. Plaintiff failed to establish the likelihood of success on the merits or a likelihood of irreparable harm, and therefore did not satisfy the requirements for a temporary restraining order or preliminary injunction.
3. Based on the information before the court, the workers' compensation case appeared to be non-removable because 28 U.S.C. § 1445(c) prohibits removal of a civil action arising under a state's workers' compensation laws.
4. HIPAA does not provide a private right of action, and plaintiff therefore could not establish federal-question jurisdiction solely by pleading a HIPAA violation.

KEY QUOTATIONS

"The purpose of a temporary restraining order under Rule 65(b) of the Federal Rules of Civil Procedure is to preserve the status quo and to prevent irreparable harm "so long as is necessary to hold a hearing, and no longer."" (at 2)

“a civil action in any State court arising under the workmen’s compensation laws of such State may not be removed to any district court of the United States.” (at 4)

“HIPAA does not provide any private right of action” (at 5)

FACTUAL BACKGROUND

Plaintiff alleged that she was involved in a workers’ compensation case and had moved to quash a subpoena for her medical records. She claimed that defendants obtained the records before the motion to quash was heard and without authorization or a proper legal basis. Plaintiff sought to enjoin an upcoming Workers’ Compensation Appeals Board trial, asserting that the proceeding violated federal removal law and threatened irreparable harm.

PROCEDURAL HISTORY

Plaintiff filed the action on February 21, 2025, alleging that defendants improperly obtained her medical records and asserting federal and state claims. She filed the motion for temporary restraining order and preliminary injunction on February 24, 2025. The presiding district judge referred the motion to Magistrate Judge Carolyn K. Delaney for findings and recommendations, which recommended denial based on procedural defects and failure to satisfy the requirements for preliminary relief.

DISPOSITION

other

CASES CITED

- *Granny Goose Foods, Inc. v. Brotherhood of Teamsters*, 415 U.S. 423, 439 (1974)
- *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008)
- *Stuhlbarg International Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001)
- *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131, 1135 (9th Cir. 2011)
- *Where Do We Go Berkeley v. California Department of Transportation*, 32 F.4th 852, 859 (9th Cir. 2022)
- *Johnson v. Couturier*, 572 F.3d 1067, 1083 (9th Cir. 2009)
- *Flynt Distributing Co. v. Harvey*, 734 F.2d 1389, 1394 (9th Cir. 1984)
- *Tri-Valley CAREs v. U.S. Department of Energy*, 671 F.3d 1113, 1131 (9th Cir. 2012)
- *Nible v. Macomber*, No. 2:24-cv-01259-DJC-CSK-PC, 2024 WL 2133319, at *2 (E.D. Cal. May 13, 2024)
- *United States v. Streich*, 560 F.3d 926, 935 (9th Cir. 2009)
- *Vacek v. United States Postal Service*, 447 F.3d 1248, 1250 (9th Cir. 2006)
- *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375, 377 (1994)
- *Caterpillar Inc. v. Williams*, 482 U.S. 386, 392 (1987)
- *Baird v. Bonta*, 81 F.4th 1036, 1044 (9th Cir. 2023)
- *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1127 (9th Cir. 2009)
- *Brentwood Academy v. Tennessee Secondary School Athletic Association*, 531 U.S. 288, 295 (2001)

- Lugar v. Edmondson Oil Co., 457 U.S. 922, 936 (1982)
- Cisco Systems, Inc. v. California Workers' Compensation Appeals Board, No. C 00-21092 JW, 2001 WL 34780587, at *6 (N.D. Cal. Mar. 28, 2001)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Ylst, 951 F.2d 1153, 1156-57 (9th Cir. 1991)

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