

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Meraz-Espinoza v. Santoyo

No. 23-cv-05947-WHO (PR) (N.D. Cal. Apr. 15, 2025) · No. 23-cv-05947-WHO (PR) · Decided April 15, 2025

SUMMARY

The United States District Court for the Northern District of California granted the defendant’s motion to extend the dispositive-motion deadline to July 7, 2025. The court denied the plaintiff’s motion for appointment of counsel, finding no exceptional circumstances because the claims were not legally complex, the filings were clear, and there was no immediate need for legal research. The court stated it would reconsider appointment of counsel if circumstances later warranted.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	William H. Orrick
JURISDICTION	United States District Court for the Northern District of California
DECIDED	April 15, 2025
DOCKET	23-cv-05947-WHO (PR)
DISPOSITION	other
PROCEDURAL POSTURE	In a prisoner civil-rights action, the defendant moved to extend the dispositive-motion deadline, and the plaintiff moved for appointment of counsel under 28 U.S.C. § 1915.
STANDARD OF REVIEW	Appointment of counsel for an indigent litigant under 28 U.S.C. § 1915 is reviewed under the trial court's sound discretion and requires exceptional circumstances, evaluated by considering the likelihood of success on the merits and the plaintiff's ability to articulate claims pro se in light of the complexity of the legal issues.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated.

TOPICS

- prisoners rights
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the defendant should receive an extension of the dispositive-motion filing deadline.
2. Whether exceptional circumstances justified appointing counsel for the indigent pro se plaintiff under 28 U.S.C. § 1915.

HOLDINGS

1. The defendant's motion to extend the dispositive-motion filing deadline was granted, requiring the dispositive motion to be filed by July 7, 2025, with opposition and reply deadlines set by the court.
2. Appointment of counsel was unwarranted because the plaintiff did not demonstrate exceptional circumstances. Clear filings, noncomplex legal issues, and the absence of an immediate need for legal research weighed against appointment.

KEY QUOTATIONS

“the sound discretion of the trial court and is granted only in “exceptional circumstances.”” (at 1)

“Meraz-Espinoza has not shown that exceptional circumstances exist.” (at 2)

FACTUAL BACKGROUND

Meraz-Espinoza, an incarcerated pro se plaintiff, alleged that jailors failed to protect him from another inmate and failed to summon medical help. He argued that insufficient prison law-library access, the complexity of the issues, and the benefits of counsel justified appointment of counsel. The court found that his filings were clear, that the case did not present complex legal issues, and that there was no immediate need for legal research because the defendant had not yet filed a dispositive motion.

PROCEDURAL HISTORY

The action was pending in the Northern District of California before dispositive motions had been filed. The court granted the defendant additional time to file a dispositive motion and denied the plaintiff's motion for appointment of counsel, while leaving open the possibility of reconsideration if circumstances later warranted.

DISPOSITION

other

CASES CITED

- Franklin v. Murphy, 745 F.2d 1221, 1236 (9th Cir. 1984)
- Agyeman v. Corrections Corp. of America, 390 F.3d 1101, 1103 (9th Cir. 2004)
- Rand v. Rowland, 113 F.3d 1520, 1525 (9th Cir. 1997)

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