

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Goodwin v. Social Security Administration, et al.

Goodwin v. Social Security Administration, Case No. 1:25-cv-00430-SAB (E.D. Cal. May 22, 2025) · No. 1:25-cv-00430-SAB · Decided May 22, 2025

SUMMARY

The United States District Court for the Eastern District of California screened a pro se, in forma pauperis complaint asserting claims against the Social Security Administration, the California Department of Insurance, and State Farm Insurance Company. The court held that the complaint failed to comply with Federal Rule of Civil Procedure 8 and did not state cognizable claims under the ADA, 42 U.S.C. § 1983, the Social Security Act, California insurance regulations, or negligence. The court granted Plaintiff 30 days to file a first amended complaint and warned that failure to do so could result in dismissal without leave to amend.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Stanley A. Boone
JURISDICTION	United States District Court, Eastern District of California
DECIDED	May 22, 2025
DOCKET	1:25-cv-00430-SAB
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff proceeding in forma pauperis filed a civil action alleging ADA, 42 U.S.C. § 1983, Social Security Act, California insurance-regulation, and negligence claims. The magistrate judge screened the complaint under 28 U.S.C. § 1915(e)(2) and ordered plaintiff to file an amended complaint.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court screens an in forma pauperis complaint and must dismiss it if it is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. For failure to state a claim, the court applies the pleading standard of Federal Rule of Civil Procedure 8(a), accepts factual allegations as true, liberally construes a pro se pleading, and disregards legal conclusions.

PRECEDENTIAL VALUE	unpublished district court order; limited persuasive value
PARTIES	Duchun Goodwin v. Social Security Administration, California Department of Insurance, State Farm Insurance Company

TOPICS

civil procedure pleadings ada / disability section 1983 insurance

PRACTICE AREAS

civil procedure civil rights disability discrimination social security insurance

QUESTIONS PRESENTED

1. Whether the complaint should be dismissed or require amendment under 28 U.S.C. § 1915(e)(2) and Federal Rule of Civil Procedure 8.
2. Whether the complaint adequately pleaded a Title II or Title III ADA claim.
3. Whether the complaint adequately pleaded a claim under 42 U.S.C. § 1983 against the named defendants.
4. Whether the complaint stated a cognizable private claim under the Social Security Act.
5. Whether the complaint stated a claim under the California Fair Claims Settlement Practices Regulations or for negligence.
6. Whether plaintiff should be granted leave to amend.

HOLDINGS

1. The court must screen an in forma pauperis complaint and dismiss it if it is frivolous or malicious, fails to state a claim on which relief may be granted, or seeks monetary relief from an immune defendant.
2. A complaint must provide a short and plain statement giving each defendant fair notice of the claims and grounds for liability; a pleading that combines multiple claims without identifying the facts, defendants, and legal elements associated with each claim fails Rule 8.
3. The complaint failed to state a Title II or Title III ADA claim because it did not adequately allege the required elements or identify the defendants and conduct supporting liability.
4. The complaint failed to state a § 1983 claim because the Social Security Administration is a federal agency rather than a state actor, and the complaint did not plausibly allege that State Farm or the California Department of Insurance was a person acting under color of state law.
5. As pleaded, the complaint did not state a cognizable claim under the Social Security Act because the court was unaware of a private right of action authorizing the relief sought.
6. The California Fair Claims Settlement Practices Regulations do not create a private right of action, so plaintiff failed to state a cognizable claim based solely on alleged violations of those regulations.

7. The complaint failed to state a negligence claim because it did not allege that any defendant owed plaintiff a duty, breached that duty, or proximately caused an injury.
8. Plaintiff was entitled to one opportunity to amend the complaint to cure the identified pleading deficiencies, subject to the requirements stated in the order.

KEY QUOTATIONS

“one party pleads multiple claims and does not identify which specific facts are allocated to which claim.” (3)

“purely private conduct, no matter how wrongful, is not within the protective orbit of section 1983.” (5)

“Plaintiff’s complaint fails to state a cognizable claim for relief.” (7)

FACTUAL BACKGROUND

Plaintiff alleged that he has ADHD, previously received Social Security benefits, and was approved for benefits in January 2025 but had not received an award letter or payment. He alleged that the Social Security Administration imposed a payee requirement and delayed benefits, while the California Department of Insurance allegedly failed to resolve his complaints. He also alleged that State Farm discontinued living benefits after his home was destroyed in a hate crime and denied or mishandled coverage. The complaint asserted ADA, § 1983, Social Security Act, California insurance-regulation, and negligence claims, but did not connect specific facts to particular defendants or claims.

PROCEDURAL HISTORY

Plaintiff filed the complaint against the Social Security Administration, the California Department of Insurance, and State Farm Insurance Company. On screening, the court found that the complaint failed to comply with Federal Rule of Civil Procedure 8 and failed to state cognizable federal or state-law claims. The court granted one opportunity to amend within thirty days and warned that failure to do so would result in a recommendation that the action be dismissed without leave to amend.

DISPOSITION

other

CASES CITED

- Lopez v. Smith, 203 F.3d 1122, 1129-30 (9th Cir. 2000)
- Calhoun v. Stahl, 254 F.3d 845 (9th Cir. 2001)
- Cato v. United States, 70 F.3d 1103, 1106 (9th Cir. 1995)
- Barren v. Harrington, 152 F.3d 1193 (9th Cir. 1998)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-57, 570 (2007)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Swierkiewicz v. Sorema N.A., 534 U.S. 506, 512 (2002)

- Moss v. U.S. Secret Service, 572 F.3d 962, 969 (9th Cir. 2009)
- Valerio v. Boise Cascade Corp., 80 F.R.D. 626, 635 n.1 (N.D. Cal. 1978)
- United States v. Raygoza-Garcia, 902 F.3d 994, 1001 (9th Cir. 2018)
- Hughey v. Camacho, No. 2:13-CV-2665-TLN-AC, 2014 WL 5473184, at *4 (E.D. Cal. Oct. 23, 2014)
- McHenry v. Renne, 84 F.3d 1172, 1179 (9th Cir. 1996)
- Weinreich v. L.A. County Metro. Transp. Auth., 114 F.3d 976, 978 (9th Cir. 1997)
- McGary v. City of Portland, 386 F.3d 1259, 1265 (9th Cir. 2004)
- Thompson v. Davis, 295 F.3d 890, 895 (9th Cir. 2002)
- Miranda B. v. Kitzhaber, 328 F.3d 1181, 1187-88 (9th Cir. 2003)
- Fortune v. American Multi-Cinema, Inc., 364 F.3d 1075, 1082 (9th Cir. 2004)
- Nurre v. Whitehead, 580 F.3d 1087, 1092 (9th Cir. 2009)
- Long v. County of Los Angeles, 442 F.3d 1178, 1185 (9th Cir. 2006)
- Jones v. Williams, 297 F.3d 930, 934 (9th Cir. 2002)
- Ouzts v. Maryland Nat. Ins. Co., 505 F.2d 547, 550 (9th Cir. 1974)
- Van Ort v. Estate of Stanewich, 92 F.3d 831 (9th Cir. 1996)
- Goodwin v. State Farm Gen. Ins. Co., No. 1:24-CV-00795-JLT-SAB, 2024 WL 3889915, at *6 (E.D. Cal. Aug. 21, 2024)
- Height St. Skilled Care, LLC v. Liberty Mut. Ins. Co., No. 1:21-cv-01247-JLT-BAK (BAM), 2022 WL 1665220, at *5 (E.D. Cal. May 25, 2022)
- Aerojet Rocketdyne, Inc. v. Glob. Aerospace, Inc., No. 2:17-CV-01515-KJM-AC, 2020 WL 3893395, at *6 (E.D. Cal. July 10, 2020)
- Rattan v. United Servs. Auto. Ass'n, 84 Cal. App. 4th 715, 724 (2000)
- Brown v. USA Taekwondo, 11 Cal. 5th 204, 213, 483 P.3d 159 (2021)
- Nally v. Grace Community Church, 47 Cal. 3d 278, 292, 763 P.2d 948 (1988)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Lacey v. Maricopa Cnty., 693 F.3d 896, 927 (9th Cir. 2012)