

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ernest Godfrey Logan, Jr. v. Metro Transit Association

Logan v. Metro Transit Association · No. 2:25-cv-02551-DAD-SCR · Decided September 11, 2025

SUMMARY

The United States District Court for the Eastern District of California determined that venue was improper because the plaintiff, defendant, and alleged events were connected to Los Angeles in the Central District of California. Pursuant to 28 U.S.C. § 1406(a), the court transferred the action, including the pending in forma pauperis motion, to the Central District of California and ordered the Eastern District case closed.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 11, 2025
DOCKET	2:25-cv-02551-DAD-SCR
DISPOSITION	transferred
PROCEDURAL POSTURE	Plaintiff filed a pro se civil complaint and a motion to proceed in forma pauperis. Before the defendant appeared, the court sua sponte determined that venue was improper and transferred the action to the Central District of California under 28 U.S.C. § 1406(a).
STANDARD OF REVIEW	The court independently assessed venue and raised the venue issue sua sponte because the defendants had not appeared or waived a venue challenge.
PRECEDENTIAL VALUE	Unpublished federal district court order; nonprecedential.

TOPICS

- venue
- civil procedure
- remedies

PRACTICE AREAS

- civil procedure
- venue
- federal courts

QUESTIONS PRESENTED

1. Whether venue was proper in the Eastern District of California under 28 U.S.C. § 1391(b).
2. Whether the action should be transferred rather than dismissed under 28 U.S.C. § 1406(a) because it was filed in the wrong venue.

HOLDINGS

1. Venue was improper in the Eastern District of California because the defendant and bus driver were alleged to be in Los Angeles and the events giving rise to the claim appeared to have occurred in Los Angeles, so the complaint did not establish that a substantial part of the relevant events occurred in the Eastern District.
2. The action should be transferred to the Central District of California rather than dismissed because plaintiff may have accidentally filed in the wrong venue and the court could not conclude that there were no circumstances under which the complaint could state a cognizable claim.

KEY QUOTATIONS

“As the Defendants have not appeared and have not waived a challenge to venue, the Court may raise the issue sua sponte.” (at 1)

“Transfer is generally preferred over dismissal where the plaintiff made an honest mistake as to where the suit could have been brought.” (at 2)

FACTUAL BACKGROUND

Plaintiff alleged that a Metro Transit Association bus driver in Los Angeles stole his wallet. The complaint referred to Bus #40 at Crenshaw and King Boulevard in Los Angeles, and plaintiff listed a Los Angeles address. The complaint also mentioned Social Security benefits and attached a benefits letter.

PROCEDURAL HISTORY

Plaintiff filed the action in the Eastern District of California on September 5, 2025, identifying the Central District of California in the complaint caption and listing a Los Angeles address. The court concluded that the alleged defendant, bus driver, plaintiff, and events were connected to Los Angeles rather than the Eastern District. Because plaintiff may have made an honest venue mistake and the court could not conclude that amendment would be futile, it transferred the action, including the pending in forma pauperis motion, and directed the clerk to close the case.

DISPOSITION

transferred

REMAND INSTRUCTIONS

The action, including the pending motion to proceed in forma pauperis, was transferred to the United States District Court for the Central District of California. Plaintiff was instructed to direct further filings and inquiries

to that court, and the Eastern District of California clerk was directed to close the case.

CASES CITED

- Costlow v. Weeks, 790 F.2d 1486, 1488 (9th Cir. 1986)
- Gigena v. Rye, 2023 WL 7286665 (E.D. Cal. Nov. 1, 2023)
- Miller v. Hambrick, 905 F.2d 259, 262 (9th Cir. 1990)
- Wood v. Santa Barbara Chamber of Commerce, 705 F.2d 1515, 1523 (9th Cir. 1983)
- Lemon v. Kramer, 270 F. Supp. 3d 125, 140 (D.D.C. 2017)

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