

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Christopher Nathaniel Washington v. Ralph Diaz, et al.

Washington v. Diaz · No. 2:20-cv-2261 KJM AC P · Decided May 28, 2025

SUMMARY

The United States District Court for the Eastern District of California partially adopts findings and recommendations in a prisoner civil rights action under 42 U.S.C. § 1983. The court denies defendants’ motion for summary judgment on First Amendment retaliation and Eighth Amendment failure-to-protect claims based on allegedly labeling the plaintiff a “snitch on staff,” declines to grant qualified immunity at that stage, and denies the plaintiff’s motions.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	May 28, 2025
DOCKET	2:20-cv-2261 KJM AC P
DISPOSITION	other
PROCEDURAL POSTURE	The district court conducted de novo review of a magistrate judge's findings and recommendations concerning motions for reconsideration, leave to file a motion for summary judgment, and defendants' motion for summary judgment in a prisoner civil-rights action under 42 U.S.C. § 1983.
STANDARD OF REVIEW	De novo review under 28 U.S.C. § 636(b)(1)(C) and Local Rule 304; summary judgment is evaluated by viewing reasonable inferences in the light most favorable to the nonmoving party.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order
PARTIES	Christopher Nathaniel Washington v. Ralph Diaz, et al.

TOPICS

- prisoners rights
- civil rights
- section 1983
- summary judgment
- qualified immunity

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether a genuine dispute of material fact precluded summary judgment on Washington's First Amendment retaliation claim based on prison officials allegedly spreading rumors that he was a snitch on staff.
2. Whether a genuine dispute of material fact precluded summary judgment on Washington's Eighth Amendment failure-to-protect claim based on the same alleged statements.
3. Whether defendants were entitled to qualified immunity at the summary-judgment stage.
4. Whether Washington was entitled to reconsideration of the order denying his motion for a preliminary injunction or leave to file his own motion for summary judgment.

HOLDINGS

1. Summary judgment was denied because the evidence, viewed in Washington's favor, created a genuine dispute of material fact as to whether defendants spread rumors that Washington was a snitch on staff and thereby chilled his First Amendment rights.
2. Summary judgment was denied because a genuine dispute of material fact existed as to whether spreading rumors that Washington was a snitch on staff placed him at risk of harm from other inmates and violated the Eighth Amendment.
3. Defendants were not entitled to qualified immunity at that stage because it had been clearly established in the Ninth Circuit since at least 1989 that spreading rumors that a prisoner is a snitch can violate the prisoner's First and Eighth Amendment rights.

KEY QUOTATIONS

“While these arguments may prove convincing to a jury, they are untenable to support summary judgment, as they rely on inferences favorable to the defendants and not to the plaintiff.” (at 3)

“A reasonable jury could thus find the staff spread rumors Washington was a snitch on staff, that spreading the rumors Washington was a snitch on staff put Washington’s safety at risk, and that the rumors chilled his First Amendment rights to complain about staff conduct through legal channels.” (at 4)

FACTUAL BACKGROUND

Washington alleged that prison officials told other inmates that he was a snitch on staff after he had settled a lawsuit against other officers. He submitted a declaration from another inmate stating that defendants said Washington “needs to be murdered he snitches on correction staff in court!” Washington contended that the statements placed him at risk of violence and chilled his First Amendment right to complain about prison staff through legal channels.

PROCEDURAL HISTORY

Washington, a state prisoner proceeding pro se, filed a § 1983 action and the matter was referred to a magistrate judge. After the magistrate judge issued findings and recommendations, Washington filed objections. The district court adopted the recommendations in part, denied Washington's motions, denied defendants' motion for summary judgment on the challenged First and Eighth Amendment claims, declined to grant qualified immunity at that stage, and referred the matter back for further pretrial proceedings.

DISPOSITION

other

REMAND INSTRUCTIONS

The matter was referred back to the assigned magistrate judge for all further pretrial proceedings. Defendants may renew their motion for qualified immunity at trial.

CASES CITED

- Valandingham v. Bojorquez, 866 F.2d 1135, 1137-39 (9th Cir. 1989)
- Mitchell v. Baeza, No. 20-0857, 2024 WL 2021861, at *4-5, 17 (E.D. Cal. Jan. 18, 2024)
- Quinn v. Singh, No. 11-1085, 2012 WL 3868014, at *2, 7 (S.D. Cal. July 27, 2012)
- Walton v. Harkleroad, No. 13-1109, 2016 WL 11480713, at *2-3, 13 (W.D. Pa. Mar. 3, 2016)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 587-88 (1986)
- Adickes v. S.H. Kress & Co., 398 U.S. 144, 157 (1970)