

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Stockton v. Smith

No. 24-cv-06676-HSG (N.D. Cal. Mar. 4, 2025) · No. 24-cv-06676-HSG · Decided March 4, 2025

SUMMARY

The United States District Court for the Northern District of California granted Robert John Stockton leave to file his first amended complaint but dismissed that complaint with leave to amend. The court found deficiencies including improper joinder, lack of supervisory liability under 42 U.S.C. § 1983, insufficient claims based on grievance review and Miranda procedures, and inadequate due-process allegations. The court also denied Stockton’s requests for appointment of counsel without prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Haywood S. Gilliam, Jr.
JURISDICTION	United States District Court for the Northern District of California
DECIDED	March 4, 2025
DOCKET	24-cv-06676-HSG
DISPOSITION	other
PROCEDURAL POSTURE	A pro se prisoner brought an action under 42 U.S.C. § 1983. The court granted leave to file the first amended complaint, screened that complaint under 28 U.S.C. § 1915A, dismissed it with leave to amend, and denied requests for appointment of counsel.
STANDARD OF REVIEW	Preliminary screening under 28 U.S.C. § 1915A; the court assessed whether the pleading was frivolous, malicious, failed to state a claim, or sought monetary relief from an immune defendant. The pleading was liberally construed because Plaintiff proceeded pro se.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order

TOPICS

- joinder
- motion to amend
- section 1983
- prisoners rights
- due process

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff should be granted leave to file the first amended complaint.
2. Whether the amended complaint satisfied the federal joinder requirements by asserting claims arising from the same transaction or occurrence and sharing a common question of law or fact.
3. Whether the amended complaint stated cognizable § 1983 claims against supervisors based solely on their supervisory roles.
4. Whether officials could be held liable under § 1983 merely for reviewing or denying grievances.
5. Whether an alleged violation of Miranda's prophylactic rules supports a damages action under § 1983.
6. Whether restrictive, nonpunitive prison conditions generally implicate a protected liberty interest under the Due Process Clause.
7. Whether Plaintiff demonstrated exceptional circumstances warranting appointment of counsel.

HOLDINGS

1. The court granted Plaintiff leave to file the first amended complaint because the action had not yet been screened and defendants had not been served.
2. The court dismissed the amended complaint with leave to amend because it contained multiple pleading and joinder deficiencies.
3. Plaintiff could not pursue unrelated claims against multiple defendants in one action unless the claims arose from the same transaction, occurrence, or series of transactions or occurrences and shared a common question of law or fact.
4. Section 1983 does not impose liability on an individual solely because that person supervised an alleged wrongdoer.
5. A prison official's denial or review of an inmate grievance generally does not constitute sufficient participation in the underlying constitutional violation to create personal liability under § 1983.
6. An alleged violation of Miranda's prophylactic rules does not, by itself, support a damages action under § 1983.
7. Restrictive conditions imposed for nonpunitive reasons generally do not implicate the Due Process Clause absent an atypical and significant hardship or a protected liberty interest.
8. The court denied appointment of counsel because Plaintiff did not demonstrate exceptional circumstances, without prejudice to later appointment if circumstances change.

KEY QUOTATIONS

“Specific facts are not necessary; the statement need only “give the defendant fair notice of what the . . . claim is and the grounds upon which it rests.”” (Opinion at 2)

“There is no constitutional right to counsel in a civil case unless an indigent litigant may lose his physical liberty if he loses the litigation.” (Opinion at 3)

“A court “may request an attorney to represent any person unable to afford counsel.”” (Opinion at 3)

FACTUAL BACKGROUND

Plaintiff, an inmate at Pelican Bay State Prison, alleged that prison officials exposed him to a known enemy, subjected him to an assault involving restraints and force, imposed restrictive administrative-segregation conditions and strip searches, altered tablet access, mishandled or denied grievances, and retaliated against him for litigation activity. He asserted violations of the First, Eighth, and Fourteenth Amendments and sought damages and an injunction transferring him to another prison. The amended complaint combined claims concerning several separate incidents involving different defendants.

PROCEDURAL HISTORY

Plaintiff initiated the action in September 2024 and electronically filed the complaint in January 2025. He filed a first amended complaint and a request for leave to amend on February 3, 2025. Before service and before screening the initial complaint, the court granted leave to file the first amended complaint, screened it, dismissed it with leave to file a second amended complaint within twenty-eight days, and denied appointment of counsel without prejudice.

DISPOSITION

other

CASES CITED

- Janicki Logging Co. v. Mateer, 42 F.3d 561, 566 (9th Cir. 1994)
- United States v. Qazi, 975 F.3d 989, 993 (9th Cir. 2020)
- Erickson v. Pardus, 551 U.S. 89, 93 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009)
- West v. Atkins, 487 U.S. 42 (1988)
- Taylor v. List, 880 F.2d 1040, 1045 (9th Cir. 1989)
- Leer v. Murphy, 844 F.2d 628, 634 (9th Cir. 1988)
- Wilson v. Woodford, No. 1:05-cv-00560-OWW-SMS, 2009 WL 839921, at *6 (E.D. Cal. Mar. 30, 2009)
- Ramirez v. Galaza, 334 F.3d 850, 860 (9th Cir. 2003)
- Mann v. Adams, 855 F.2d 639, 640 (9th Cir. 1988)
- Vega v. Tekoh, Vega v. Tekoh, 597 U.S. 134, 141, 149-51 (2022)
- Hewitt v. Helms, 459 U.S. 460, 468 (1983)
- Myron v. Terhune, 476 F.3d 716, 718-19 (9th Cir. 2007)
- Anderson v. County of Kern, 45 F.3d 1310, 1315 (9th Cir.), opinion amended on denial of reh'g, 75 F.3d 448 (9th Cir. 1995)

- *Lassiter v. Department of Social Services*, 452 U.S. 18, 25 (1981)
- *Wilborn v. Escalderon*, 789 F.2d 1328, 1331 (9th Cir. 1986)
- *Agyeman v. Corrections Corp. of America*, 390 F.3d 1101, 1103 (9th Cir. 2004)
- *Lacey v. Maricopa County*, 693 F.3d 896, 925 (9th Cir. 2012)

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