

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Seifert v. Pritchard

No. 1:24-cv-01097-KES-CDB (E.D. Cal. Mar. 6, 2025) · No. 1:24-cv-01097-KES-CDB · Decided March 7,
2025

SUMMARY

The United States District Court for the Eastern District of California vacates its prior findings and recommendations and issues new findings and recommendations concerning Alexandra Seifert’s civil rights complaint against Kern County Superior Court judges, a commissioner, and a court clerk. The document recommends dismissal without leave to amend based on the Rooker-Feldman doctrine, Eleventh Amendment immunity, judicial immunity, and quasi-judicial immunity. It also recommends denial of related motions and closure of the action, subject to a 21-day objection period.

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	March 7, 2025
DOCKET	1:24-cv-01097-KES-CDB
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations by a magistrate judge following screening of a pro se complaint filed in forma pauperis; the magistrate judge also vacated prior findings and recommendations.
STANDARD OF REVIEW	On screening under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis complaint that is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The court accepts factual allegations as true for screening, construes a pro se complaint liberally, and does not accept legal conclusions as true.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Alexandra Seifert v. Kenneth Pritchard, J. Eric Bradshaw, Gina Marie Cervantes, Tamarah Harber-Pickens

TOPICS

section 1983

subject matter jurisdiction

eleventh amendment immunity

sovereign immunity

civil procedure

PRACTICE AREAS

Civil rights

Federal jurisdiction

Federal civil procedure

Judicial immunity

QUESTIONS PRESENTED

1. Whether the complaint stated a civil claim based on the cited federal criminal statutes.
2. Whether the claims seeking relief from or review of state small-claims judgments were barred by the Rooker-Feldman doctrine.
3. Whether the state court judges, commissioner, and clerk were immune from suit under the Eleventh Amendment, judicial immunity, or quasi-judicial immunity.
4. Whether amendment would be futile and therefore should be denied.

HOLDINGS

1. The cited federal criminal statutes do not provide Plaintiff with a private civil cause of action in this § 1983 proceeding.
2. The complaint's claims are barred to the extent they challenge, seek to undo, or request federal relief from the decisions and procedures of the state small-claims courts.
3. The state court judges, commissioner, and clerk are immune from Plaintiff's federal claims based on the Eleventh Amendment and, independently, judicial or quasi-judicial immunity.
4. Leave to amend should be denied because the defects in Plaintiff's claims cannot be cured by alleging additional facts.

KEY QUOTATIONS

“The Rooker-Feldman doctrine bars “cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before district court proceedings commenced and inviting district court review and rejection of those judgments.”” (at 5)

“These defects cannot be cured through the assertion of additional facts; therefore, amendment would be futile.” (at 10)

FACTUAL BACKGROUND

Plaintiff challenged rulings and proceedings in two small claims actions in the Kern County Superior Court. She alleged that state court judges and a commissioner mishandled hearings, evidence, and rulings, and that a state court clerk and supervising judge made false or misleading statements or failed to respond adequately to her complaints. She sought injunctive, declaratory, monetary, and punitive relief under federal criminal statutes, 42 U.S.C. §§ 1983 and 1985, constitutional provisions, and state-law theories.

PROCEDURAL HISTORY

Plaintiff filed the civil rights complaint and an in forma pauperis application on September 16, 2024. The magistrate judge previously recommended dismissal without leave to amend, but vacated those findings and recommendations after Plaintiff filed objections and related motions. The court issued new findings and recommendations recommending dismissal without leave to amend, denial of related filings, and closure of the action, subject to review by the assigned district judge under 28 U.S.C. § 636(b)(1).

DISPOSITION

other

CASES CITED

- *Lopez v. Smith*, 302 F.3d 1122, 1129 (9th Cir. 2002)
- *Cato v. United States*, 70 F.3d 1103, 1106 (9th Cir. 1995)
- *Calhoun v. Stahl*, 254 F.3d 845 (9th Cir. 2001)
- *McHenry v. Renne*, 84 F.3d 1172, 1177 (9th Cir. 1996)
- *Kimes v. Stone*, 84 F.3d 1121, 1129 (9th Cir. 1996)
- *Neitzke v. Williams*, 490 U.S. 319, 325, 327 (1989)
- *Franklin v. Murphy*, 745 F.2d 1221, 1227-28 (9th Cir. 1984)
- *Jackson v. Arizona*, 885 F.2d 639, 640 (9th Cir. 1989)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 554, 555, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *Hebbe v. Pliler*, 627 F.3d 338, 342 (9th Cir. 2010)
- *United States v. Qazi*, 975 F.3d 989, 992-93 (9th Cir. 2020)
- *Clinton v. Allison*, No. 3:23-cv-01471-CAB-SBC, 2024 WL 1859956, at *10 (S.D. Cal. Apr. 29, 2024)
- *Jones v. County of Sonoma*, No. 23-cv-02730-CRB, 2024 WL 1354496, at *4 (N.D. Cal. Mar. 29, 2024)
- *Bland v. Gross*, No. 1:20-cv-00542-DAD-BAM (PC), 2021 WL 120964, at *1 (E.D. Cal. Jan. 13, 2021)
- *Rope v. Facebook, Inc.*, No. CV 14-4900 UA, 2015 WL 13918858, at *2 (C.D. Cal. Oct. 26, 2015)
- *Loadholt v. Obama*, No. 2:13-cv-2607-MCE-EFB PS, 2015 WL 848549, at *3 (E.D. Cal. Feb. 26, 2015)
- *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462, 482-86 (1986)
- *Rooker v. Fidelity Trust Co.*, 263 U.S. 413, 416 (1923)
- *Exxon Mobil Corp. v. Saudi Basic Industries Corp.*, 544 U.S. 280, 284 (2005)
- *Branson v. Nott*, 62 F.3d 287, 291-92 (9th Cir. 1995)
- *Amphastar Pharmaceuticals Inc. v. Aventis Pharma SA*, 856 F.3d 696, 710 (9th Cir. 2017)
- *Dubinka v. Judges of the Superior Court*, 23 F.3d 218, 221 (9th Cir. 1994)
- *Worldwide Church of God v. McNair*, 805 F.2d 888, 891 (9th Cir. 1986)
- *Bianchi v. Rylaarsdam*, 334 F.3d 895, 900 n.4, 901 (9th Cir. 2003)
- *Noel v. Hall*, 341 F.3d 1148, 1156, 1163, 1185 (9th Cir. 2003)

- Bell v. County of Boise, 709 F.3d 890, 897 (9th Cir. 2013)
- Rickrode v. W.C.A.B., 191 F.3d 461 (9th Cir. 1999) (unpublished)
- Conerly v. Davenport, No. 21-17081, 2022 WL 17223039, at *1 (9th Cir. Nov. 25, 2022)
- Conerly v. Tarpin, No. 2:19-cv-2535 JAM DB PS, 2021 WL 2310407, at *9 (E.D. Cal. June 7, 2021)
- Conerly v. Permanente, No. 21-16603, 2022 WL 17592188 (9th Cir. Dec. 13, 2022)
- deRosier v. Longaker, 551 F. App'x 362 (9th Cir. 2014)
- Pinzon v. Jensen, No. CIV-F-08-1543 AWI GS, 2009 WL 4134809, at *4-5 (E.D. Cal. Nov. 23, 2009)
- Benavidez v. County of San Diego, 933 F.3d 1134, 1143 (9th Cir. 2019)
- Munoz v. Superior Court of Los Angeles County, 91 F.4th 977, 980-81 (9th Cir. 2024)
- Durning v. Citibank, N.A., 950 F.2d 1419, 1422 (9th Cir. 1991)
- National Resources Defense Council v. California Department of Transportation, 96 F.3d 420, 421 (9th Cir. 1996)
- Whole Woman's Health v. Jackson, Whole Woman's Health v. Jackson, 595 U.S. 30, 39 (2021)
- Aholelei v. Department of Public Safety, 488 F.3d 1144, 1147 (9th Cir. 2007)
- Meek v. County of Riverside, 183 F.3d 962, 965 (9th Cir. 1999)
- Franceschi v. Schwartz, 57 F.3d 828, 831 (9th Cir. 1995)
- Mullis v. U.S. Bankruptcy Court for the District of Nevada, 828 F.2d 1385, 1390 (9th Cir. 1987)
- Lopez v. Smith, 203 F.3d 1122, 1130 (9th Cir. 2000) (en banc)
- Doe v. United States, 58 F.3d 494, 497 (9th Cir. 1995)
- Leadsinger, Inc. v. BMG Music Publishing, 512 F.3d 522, 532 (9th Cir. 2008)
- Castro v. United States, 540 U.S. 375, 381-82 (2003)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)