

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Steven Oscar Austin v. Unknown

Austin v. Unknown · No. 2:25-cv-2054 DAD CSK P · Decided December 5, 2025

SUMMARY

The United States Magistrate Judge recommends denying Steven Oscar Austin’s motion for a temporary restraining order in his 28 U.S.C. § 2254 habeas proceeding. The recommendation concludes that Austin’s habeas claims are unexhausted, that many asserted conditions-of-confinement claims must instead be brought under a civil rights action, and that the remaining access-to-courts allegations do not establish an inability to litigate the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 5, 2025
DOCKET	2:25-cv-2054 DAD CSK P
DISPOSITION	other
PROCEDURAL POSTURE	State prisoner proceeding pro se in a 28 U.S.C. § 2254 habeas action moved for a temporary restraining order. The magistrate judge issued findings and recommendations recommending denial of the motion, subject to review by the assigned district judge.
STANDARD OF REVIEW	Temporary restraining orders and preliminary injunctions are governed by substantially identical standards. The movant must establish a likelihood of success on the merits, a likelihood of irreparable harm absent relief, that the balance of equities favors relief, and that an injunction is in the public interest.
PRECEDENTIAL VALUE	Unknown; findings and recommendations pending review by the assigned district judge.
PARTIES	Steven Oscar Austin v. Unknown

TOPICS

federal habeas corpus

injunctions

post-conviction relief

prisoners rights

civil rights

PRACTICE AREAS

federal habeas corpus

prisoners rights

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QUESTIONS PRESENTED

1. Whether petitioner demonstrated entitlement to a temporary restraining order under the federal injunction standard.
2. Whether unexhausted habeas claims supported a likelihood of success on the merits for purposes of temporary injunctive relief.
3. Whether claims challenging prison conditions were properly brought in a habeas action rather than a civil rights action.
4. Whether allegations concerning denial of legal property, access to courts, and mail tampering justified temporary injunctive relief in the habeas action.

HOLDINGS

1. Petitioner was not entitled to a temporary restraining order because he failed to establish the required likelihood of success on the merits and otherwise failed to demonstrate grounds for relief.
2. Claims challenging conditions of confinement, rather than the fact or length of custody, are properly brought in a civil rights action and not in a habeas petition.

KEY QUOTATIONS

“Injunctive relief is “an extraordinary remedy that may only be awarded upon a clear showing that the [petitioner] is entitled to such relief.”” (slip op. at 1)

“a civil rights action is the “proper remedy” for a petitioner asserting “a constitutional challenge to the conditions of his prison life, but not to the fact or length of his custody.”” (slip op. at 3)

FACTUAL BACKGROUND

Petitioner, a state prisoner, alleged that he was falsely imprisoned, transferred among prisons, assaulted, falsely labeled, denied or improperly provided medical treatment, deprived of property and identifying documents, and denied access to legal materials, courts, and mail. He sought return of property, restitution, release, cessation of transfers, discovery, and an emergency hearing. The court noted that the underlying habeas claims were unexhausted and that many allegations challenged conditions of confinement rather than the fact or duration of custody.

PROCEDURAL HISTORY

Petitioner filed a petition for writ of habeas corpus under 28 U.S.C. § 2254 and a motion for a temporary restraining order. The court separately determined that petitioner's habeas claims were unexhausted and granted petitioner thirty days to seek a stay while exhausting those claims. The court recommended denying the

temporary restraining order because petitioner could not show a likelihood of success on unexhausted claims and because many of the requested claims concerned prison conditions that must be brought, if at all, in a civil rights action.

DISPOSITION

other

CASES CITED

- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20, 22 (2008)
- Stuhlbarg International Sales Co. v. John D. Brush & Co., 240 F.3d 832, 839 n.7 (9th Cir. 2001)
- Klein v. City of San Clemente, 584 F.3d 1196, 1201 (9th Cir. 2009)
- Brady v. Maryland, 373 U.S. 83 (1963)
- Miranda v. Arizona, 384 U.S. 436 (1966)
- Preiser v. Rodriguez, 411 U.S. 475, 499 (1973)
- Rhines v. Weber, 544 U.S. 269 (2005)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

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