

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Erik Pyle v. Glenn County Sheriff's Department, et al.

Pyle · No. 2:24-cv-02940-TLN-CSK · Decided October 14, 2025

SUMMARY

The United States District Court for the Eastern District of California considers Plaintiff Erik Pyle’s motion to electronically file documents and Defendant Glenn County Sheriff’s Department’s motion to dismiss the First Amended Complaint. The court grants the e-filing motion in part as to electronic service and denies it as to use of the CM/ECF system. It recommends granting the motion to dismiss for failure to plead individual liability or a sufficient Monell policy or custom, with leave to amend.

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	October 14, 2025
DOCKET	2:24-cv-02940-TLN-CSK
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations on a defendant's Rule 12(b)(6) motion to dismiss a pro se plaintiff's First Amended Complaint, together with an order resolving the plaintiff's motion to e-file.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 12(b)(6), dismissal is appropriate when the complaint lacks a cognizable legal theory or sufficient facts to support one. Well-pleaded factual allegations are accepted as true and construed in the light most favorable to the nonmoving party, but conclusory allegations, contradicted allegations, and legal conclusions are not assumed true.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- motions to dismiss
- section 1983
- municipal liability
- civil rights
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the First Amended Complaint stated a claim under 42 U.S.C. § 1983 against Glenn County Sheriff's Department and related municipal defendants.
2. Whether the complaint adequately alleged individual participation or a causal connection by any named individual defendant.
3. Whether the complaint adequately alleged a municipal policy or custom sufficient to support Monell liability.
4. Whether dismissal should be with leave to amend.
5. Whether plaintiff's late opposition and unauthorized sur-reply should be considered.
6. Whether plaintiff should receive permission to use CM/ECF and electronic service.

HOLDINGS

1. The First Amended Complaint failed to state a § 1983 claim because it did not allege facts connecting a named individual defendant to the alleged constitutional violations and did not allege facts showing that a municipal policy or custom caused the injuries.
2. Dismissal should be recommended with leave to amend because it was conceivable that plaintiff could allege additional facts supporting a Monell claim.
3. The court considered plaintiff's late opposition because of his pro se status and defendant's substantive response, but declined to consider the unauthorized sur-reply because plaintiff had no right to file it and no new argument or evidence justified it.
4. Plaintiff's motion to e-file was denied insofar as it sought permission to use CM/ECF, but granted insofar as it sought electronic service and email notifications.

KEY QUOTATIONS

"In order to establish municipal liability [under Monell], a plaintiff must show that a 'policy or custom' led to the plaintiff's injury." (at 7)

"The FAC makes conclusory allegations and does not allege specific facts demonstrating Plaintiff's alleged constitutional violations resulted from Defendants Glenn County Sheriff's Department and Orland Police Department's "execution of a government's policy or custom" as required." (at 8)

"Leave to amend should be granted if it appears possible that the defects in the complaint could be corrected, especially if a plaintiff is pro se." (at 9)

"This means that pleadings and filings that include "hallucinations" from the use of generative AI (i.e., made up facts or legal authority) can violate Rule 11." (at 6)

FACTUAL BACKGROUND

Plaintiff alleged that on June 8, 2024, approximately ten deputies from the Glenn County Sheriff's Department and Orland Police Department responded to his location based on false accusations by his ex-wife. He alleged that deputies approached him with firearms, escalated the encounter, arrested him without a warrant or probable cause, and used excessive force. He further alleged that he was held in jail under unsanitary and inhumane conditions, denied medical care, telephone access, and legal counsel, and was not promptly informed of the charges.

PROCEDURAL HISTORY

Plaintiff filed the action on October 25, 2024, and later paid the filing fee after his in forma pauperis request was denied without prejudice. After plaintiff failed to timely oppose an earlier motion to dismiss, the court granted him leave to amend and denied that motion as moot. Plaintiff filed the First Amended Complaint, alleging § 1983 claims for unlawful arrest and detention, excessive force, and inhumane jail conditions. Defendant Glenn County Sheriff's Department moved to dismiss, and the magistrate judge recommended granting the motion with leave to amend; the recommendation was subject to objections and review by the assigned district judge.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. The magistrate judge recommended that the motion to dismiss be granted and that plaintiff be given thirty days from any order adopting the findings and recommendations to file a Second Amended Complaint. The recommendation was submitted to the assigned district judge under 28 U.S.C. § 636(b)(1), with fourteen days allowed for objections.

CASES CITED

- *Faulkner v. ADT Security Services*, 706 F.3d 1017, 1019 (9th Cir. 2013)
- *Paulsen v. CNF Inc.*, 559 F.3d 1061, 1071 (9th Cir. 2009)
- *Chambers v. Herrera*, 78 F.4th 1100, 1104 (9th Cir. 2023)
- *Garity v. APWU National Labor Organization*, 828 F.3d 848, 854 (9th Cir. 2016)
- *Lathus v. City of Huntington Beach*, 56 F.4th 1238, 1243 (9th Cir. 2023)
- *Broam v. Bogan*, 320 F.3d 1023, 1026 n.2 (9th Cir. 2003)
- *Mollett v. Netflix, Inc.*, 795 F.3d 1062, 1065 (9th Cir. 2015)
- *Wilder v. Virginia Hospital Association*, 496 U.S. 498, 508 (1990)
- *Albright v. Oliver*, 510 U.S. 266, 271 (1994)
- *Florer v. Congregation Pidyon Shevuyim, N.A.*, 639 F.3d 916, 921 (9th Cir. 2011)
- *Hansen v. Black*, 885 F.2d 642, 645 (9th Cir. 1989)
- *Johnson v. Duffy*, 588 F.2d 740, 743-44 (9th Cir. 1978)
- *Castro v. County of Los Angeles*, 833 F.3d 1060, 1073 (9th Cir. 2016) (en banc)
- *Anderson v. Warner*, 451 F.3d 1063, 1070 (9th Cir. 2006)

- Oviatt v. Pearce, 954 F.2d 1470, 1474 (9th Cir. 1992)
- Lee v. City of Los Angeles, 250 F.3d 668, 681 (9th Cir. 2001)
- Connick v. Thompson, 563 U.S. 51, 60 (2011)
- Lopez v. Smith, 203 F.3d 1122, 1126-31 (9th Cir. 2000)
- Cato v. United States, 70 F.3d 1103, 1105-06 (9th Cir. 1995)
- McHenry v. Renne, 84 F.3d 1172, 1177, 1179-80 (9th Cir. 1996)
- Lacey v. Maricopa County, 693 F.3d 896, 927 (9th Cir. 2012)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Yist, 951 F.2d 1153, 1156-57 (9th Cir. 1991)

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