

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Brooks v. Smith

Brooks v. Smith · No. 2:22-CV-0062-TLN-DMC-P · Decided August 15, 2025

SUMMARY

The document contains findings and recommendations addressing a prisoner-plaintiff’s motion for injunctive relief in a 42 U.S.C. § 1983 action against a prison official. The magistrate judge recommends denying relief because the requested order targeted nonparties, lacked a nexus to the underlying deliberate-indifference claim, and did not establish likely irreparable harm or likelihood of success. The findings and recommendations were issued subject to objections under 28 U.S.C. § 636(b)(1).

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dennis M. Cota
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 15, 2025
DOCKET	2:22-CV-0062-TLN-DMC-P
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a pro se prisoner proceeding under 42 U.S.C. § 1983, moved for injunctive relief requiring nonparty prison officials to return his legal and personal property. The magistrate judge issued findings and recommendations recommending denial of the motion.
STANDARD OF REVIEW	A party seeking a preliminary injunction must show likely success on the merits, likely irreparable harm absent relief, that the balance of hardships tips in the party's favor, and that an injunction is in the public interest. A mandatory injunction requires a heightened, 'doubly demanding' showing. The requested relief must also bear a nexus to the claims in the underlying complaint and comply with the Prison Litigation Reform Act's narrow-tailoring requirements.
PRECEDENTIAL VALUE	Nonprecedential and nonfinal magistrate judge findings and recommendations

TOPICS

injunctions

prisoners rights

section 1983

civil procedure

summary judgment

PRACTICE AREAS

Prisoner civil rights

Federal civil procedure

Preliminary injunctive relief

QUESTIONS PRESENTED

1. Whether the court could issue injunctive relief directed at prison officials who were not parties to the action.
2. Whether the requested relief had the required relationship or nexus to the medical deliberate-indifference claim against Smith.
3. Whether Brooks satisfied the preliminary-injunction requirements, including likelihood of success on the merits and irreparable harm.
4. Whether injunctive relief concerning prison conditions complied with the Prison Litigation Reform Act.

HOLDINGS

1. The court could not grant the requested injunction because it was directed to individuals who were not parties to the action.
2. Injunctive relief requires a relationship or nexus between the injury alleged in the motion and the conduct asserted in the underlying complaint; the requested relief must be of the same character as relief that could ultimately be granted.
3. Brooks was not entitled to injunctive relief because he did not demonstrate a likelihood of success on the underlying claim or irreparable injury absent immediate access to his legal materials.
4. A party seeking a mandatory injunction that changes rather than preserves the status quo bears a heightened, doubly demanding burden and must show that the law and facts clearly support relief.
5. Any injunction concerning prison conditions must be narrowly drawn, extend no further than necessary to correct the harm requiring preliminary relief, and use the least intrusive means necessary.

KEY QUOTATIONS

“When a mandatory injunction is sought – one that goes beyond simply maintaining the status quo during litigation – the moving party bears a “doubly demanding” burden and must establish that the law and facts clearly supports injunctive relief.” (at 1)

“Under Winter, the proper test requires a party to demonstrate: (1) he is likely to succeed on the merits; (2) he is likely to suffer irreparable harm in the absence of an injunction; (3) the balance of hardships tips in his favor; and (4) an injunction is in the public interest.” (at 1)

“To prevail on a motion for injunctive relief, “there must be a relationship between the injury claimed in the motion for injunctive relief and the conduct asserted in the underlying complaint.”” (at 2)

“Finally, pursuant to the Prison Litigation Reform Act, any injunction with respect to prison conditions “must be narrowly drawn, extend no further than necessary to correct the harm the court finds requires preliminary relief, and be the least intrusive means necessary to correct that harm.”” (at 2)

FACTUAL BACKGROUND

Brooks alleged that he was transferred from Mule Creek State Prison to the California Health Care Facility after a back injury and surgery in May 2025. He claimed that his legal and personal property had not been transferred and that he needed his legal materials to respond to Smith's pending motion for summary judgment. The requested order would have directed nonparty prison officials to return the property.

PROCEDURAL HISTORY

Brooks brought a civil-rights action against Smith arising from an alleged medical deliberate-indifference claim. After Brooks was transferred from Mule Creek State Prison to the California Health Care Facility, he moved for injunctive relief concerning legal and personal property allegedly retained at his former prison. The magistrate judge recommended denying the motion and notified the parties of their right to object under 28 U.S.C. § 636(b) (1).

DISPOSITION

other

CASES CITED

- Stormans, Inc. v. Selecky, 586 F.3d 1109, 1127 (9th Cir. 2009)
- Winter v. Natural Res. Def. Council, Inc., 555 U.S. 7, 20 (2008)
- Garcia v. Google, Inc., 786 F.3d 733, 740 (9th Cir. 2015) (en banc)
- Am. Trucking Ass'ns, Inc. v. City of Los Angeles, 559 F.3d 1046, 1052 (9th Cir. 2009)
- Shell Offshore, Inc. v. Greenpeace, Inc., 709 F.3d 1281, 1291 (9th Cir. 2013)
- Alliance for the Wild Rockies v. Cottress, 632 F.3d 1127, 1135 (9th Cir. 2011)
- Pac. Radiation Oncology, LLC v. Queen's Med. Ctr., 810 F.3d 631, 636 (9th Cir. 2015)
- De Beers Consol. Mines v. United States, 325 U.S. 212, 220 (1945)
- Zenith Radio Corp. v. Hazeltine Research, Inc., 395 U.S. 100, 112 (1969)
- Prieser v. Newkirk, 422 U.S. 395, 402-03 (1975)
- Johnson v. Moore, 948 F.3d 517, 519 (9th Cir. 1991) (per curiam)
- Wonnacott v. Heehn, 2021 WL 970453 (D. Oregon 2021)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

OPINION

1 2 3 4 5 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE EASTERN
DISTRICT OF CALIFORNIA 10 11 WILLIE LEE BROOKS, II, No. 2:22-CV-0062-TLN-DMC-
P 12 Plaintiff, 13 v. FINDINGS AND RECOMMENDATIONS 14 RAINELLE SMITH, 15
Defendant. 16 17 Plaintiff, a prisoner proceeding pro se, brings this civil rights action pursuant to
18 42 U.S.C. § 1983. Pending before the Court is Plaintiff's motion for injunctive relief.

See ECF 19 No. 129. 20 The legal principles applicable to requests for injunctive relief, such as a
21 temporary restraining order or preliminary injunction, are well established. To prevail, the 22
moving party must show that irreparable injury is likely in the absence of an injunction. See 23
Stormans, Inc. v. Selecky, 586 F.3d 1109, 1127 (9th Cir. 2009) (citing Winter v. Natural Res.

24 Def. Council, Inc., 129 S.Ct. 365 (2008)). When a mandatory injunction is sought – one that
goes 25 beyond simply maintaining the status quo during litigation – the moving party bears a
"doubly 26 demanding" burden and must establish that the law and facts clearly supports
injunctive relief. 27 See Garcia v. Google, Inc., 786 F.3d 733, 740 (9th Cir. 2015) (en banc).

Mandatory injunctions 28 are "particularly disfavored" and "should not issue in doubtful cases."
Id. (internal quotations 1 omitted). 2 To the extent prior Ninth Circuit cases suggest a lesser
standard by focusing solely 3 on the possibility of irreparable harm, such cases are "no longer
controlling, or even viable." 4 Am. Trucking Ass'ns, Inc. v. City of Los Angeles, 559 F.3d 1046,
1052 (9th Cir.

2009). Under 5 Winter, the proper test requires a party to demonstrate: (1) he is likely to succeed
on the merits; 6 (2) he is likely to suffer irreparable harm in the absence of an injunction; (3) the
balance of 7 hardships tips in his favor; and (4) an injunction is in the public interest. See
Stormans, 586 F.3d 8 at 1127 (citing Winter, 129 S.Ct. at 374).

The Ninth Circuit also recognizes an additional 9 standard: "if a plaintiff can only show that there
are 'serious questions going to the merits' – a 10 lesser showing than likelihood of success on the
merits – then a preliminary injunction may still 11 issue if the 'balance of hardships tips sharply in
the plaintiff's favor, and the other two Winter 12 factors are satisfied.'" See Shell Offshore, Inc. v.
Greenpeace, Inc., 709 F.3d 1281, 1291 (9th Cir.

13 2013) (quoting Alliance for the Wild Rockies v. Cottress, 632 F.3d 1127, 1135 (9th Cir. 2011)).
14 To prevail on a motion for injunctive relief, "there must be a relationship between 15 the injury
claimed in the motion for injunctive relief and the conduct asserted in the underlying 16
complaint." Pac. Radiation Oncology, LLC v. Queen's Medical Ctr., 810 F.3d 631, 636 (9th Cir.

17 2015). Thus, there must be a nexus between the claims raised in the motion and the claims in
the 18 underlying complaint itself. See id. This nexus is satisfied where the preliminary injunction
19 would grant "relief of the same character as that which may be granted finally." See id. (quoting

20 De Beers Consol. Mines, 325 U.S. 212, 220 (1945)). 21 The Court cannot issue an order against individuals who are not parties to the 22 action.

See Zenith Radio Corp. v. Hazeltine Research, Inc., 395 U.S. 100, 112 (1969). 23 Moreover, if an inmate is seeking injunctive relief with respect to conditions of confinement, the 24 prisoner's transfer to another prison renders the request for injunctive relief moot, unless there is 25 some evidence of an expectation of being transferred back. See Prieser v. Newkirk, 422 U.S. 26 395, 402-03 (1975); Johnson v. Moore, 948 F.3d 517, 519 (9th Cir.

1991) (per curiam). Finally, 27 pursuant to the Prison Litigation Reform Act, any injunction with respect to prison conditions 28 "must be narrowly drawn, extend no further than necessary to correct the harm the court finds 1 requires preliminary relief, and be the least intrusive means necessary to correct that harm." 18 2 U.S.C. § 3626(a)(2); see also Wonnacott v. Heehn, 2021 WL 970453 (D.

Oregon 2021). 3 Plaintiff seeks an order requiring non-party prison officials to return his legal and 4 personal property. See ECF No. 129. According to Plaintiff, he was transferred from Mule 5 Creek State Prison (MCSP) to the California Health Care Facility (CHCF) following a back 6 injury and surgery in May 2025. See id. Plaintiff states that his property has never been received 7 from MCSP and that he requires access to his legal materials in order to prepare a response to 8 Defendant's pending motion for summary judgment.

See id. 9 The Court finds that injunctive relief is not warranted in this case. First, Plaintiff 10 seeks relief directed to non-parties, which the Court cannot grant. Second, there is no nexus 11 between Plaintiff's assertion that his legal materials are being improperly withheld, and the 12 underlying medical deliberate indifference claim in this case against Defendant Smith.

Third, 13 even if there was a connection, Plaintiff has not demonstrated a likelihood of success on the 14 merits of his underlying claim. Finally, Plaintiff will not experience irreparable injury absent 15 immediate access to his legal materials.

In this regard, the Court has by separate order granted 16 Plaintiff's motion for an extension of time to respond to Defendant's motion for summary 17 judgment. 18 /// 19 /// 20 /// 21 /// 22 / / / 23 / / / 24 / / / 25 / / / 26 / / / 27 / / / 28 / / /] Based on the foregoing, the undersigned recommends that Plaintiffs motion for 2 || injunctive relief, ECF No. 129, be DENIED.

3 These findings and recommendations are submitted to the United States District 4 | Judge assigned to the case, pursuant to the provisions of 28 U.S.C. § 636(b)(1). Within 14 days 5 || after being served with these findings and recommendations, any party may file written objections 6 || with the Court. Responses to objections shall be filed within 14 days after service of objections.

7 || Failure to file objections within the specified time may waive the right to appeal. See Martinez
v. 8 | Ylst, 951 F.2d 1153 (9th Cir. 1991). 9 10 | Dated: August 14, 2025 Ss..c0_, DENNIS M.
COTA 2 UNITED STATES MAGISTRATE JUDGE 13 14 15 16 17 18 19 20 21 22 23 24 25 26
27 28