

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PRECEDENTIAL VALUE	Nonprecedential and nonfinal magistrate judge findings and recommendations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)

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