

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Gardea v. State of California

No. 2:24-cv-03383-DAD-AC (PC) · No. 2:24-cv-03383-DAD-AC (PC) · Decided June 10, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted findings and recommendations granting the plaintiff's unopposed motion to remand. The court remanded the action to the Sacramento County Superior Court after the amended complaint eliminated the federal claim that supported removal, relying on the Supreme Court's decision in *Royal Canin U.S.A., Inc. v. Wulfschleger*.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dale A. Drozd
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 10, 2025
DOCKET	2:24-cv-03383-DAD-AC (PC)
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand a removed action after her first amended complaint deleted the federal Eighth Amendment claim and left only state-law claims. The magistrate judge recommended granting the unopposed motion, and the district court adopted that recommendation.
STANDARD OF REVIEW	The district court reviewed the magistrate judge's findings and recommendations under 28 U.S.C. § 636(b)(1)(B) after the period for objections expired.
PRECEDENTIAL VALUE	Unknown; district court order
PARTIES	Adriane Gardea v. State of California, et al.

TOPICS

- subject matter jurisdiction
- motion to amend
- federalism
- civil procedure

PRACTICE AREAS

civil procedure

federal jurisdiction

remand

QUESTIONS PRESENTED

1. Whether deletion of the federal claims that enabled removal eliminates the federal court's supplemental jurisdiction over related state-law claims.
2. Whether the action should be remanded to the Sacramento County Superior Court after the federal claims were excised from the amended complaint.

HOLDINGS

1. When an amendment excises the federal-law claims that enabled removal, the federal court loses supplemental jurisdiction over the related state-law claims, and the case must be remanded to state court.
2. Plaintiff's motion to remand must be granted, and the action must be remanded to the Sacramento County Superior Court.

KEY QUOTATIONS

“When an amendment excises the federal-law claims that enabled removal, the federal court loses its supplemental jurisdiction over the related state-law claims. The case must therefore return to state court.” (at 1)

FACTUAL BACKGROUND

Plaintiff Adriane Gardea, a state prisoner proceeding through counsel, originally asserted an Eighth Amendment claim along with state-law claims. Her first amended complaint deleted the federal claim that had enabled removal, leaving related state-law claims. Defendants did not oppose plaintiff's motion to remand, and the case was in its early stages.

PROCEDURAL HISTORY

The action was removed from the Sacramento County Superior Court to the Eastern District of California. Plaintiff then filed a first amended complaint deleting the federal Eighth Amendment claim from the original complaint. Plaintiff moved to remand, defendants did not oppose, and the magistrate judge recommended remand. No objections were filed, and the district court adopted the findings and recommendations, granted the motion, remanded the action, and closed the case.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The action was remanded to the Sacramento County Superior Court, and the Clerk was directed to close the federal case.

CASES CITED

- Royal Canin U.S.A., Inc. v. Wulfschleger, 604 U.S. 22 (2025)

OPINION

(PC) Gardea v. State of California

PER CURIAM.

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8 UNITED STATES DISTRICT COURT

9 FOR THE EASTERN DISTRICT OF CALIFORNIA

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11 ADRIANE GARDEA, No. 2:24-cv-03383-DAD-AC (PC)

12 Plaintiff,

13 v. ORDER ADOPTING FINDINGS AND

RECOMMENDATIONS AND REMANDING

14 STATE OF CALIFORNIA, et al., THIS ACTION TO THE SACRAMENTO

COUNTY SUPERIOR COURT

15 Defendants. (Doc. Nos. 8, 11) 16 17 18 Plaintiff Adriane Gardea is a state prisoner proceeding through counsel. The matter was 19 referred to a United States Magistrate Judge pursuant to 28 U.S.C. § 636(b)(1)(B) and Local Rule 20 302. 21 On January 13, 2025, the assigned magistrate judge issued findings and recommendations 22 recommending that plaintiff’s unopposed motion to remand this action to the Sacramento County 23 Superior Court be granted. (Doc. No. 11 at 3.) Specifically, the magistrate judge concluded that 24 because plaintiff’s first amended complaint deleted the Eighth Amendment claim that had been 25 asserted in her original complaint, it was within the court’s discretion whether to exercise 26 supplemental jurisdiction over plaintiff’s remaining state law claims. (Id. at 1–2.) Because 27 defendants did not oppose remand and “this case is in its early stages,” the magistrate judge 28 concluded that remand to state court was appropriate. (Id. at 2.) The pending findings and 1 || recommendations were served on the parties and contained notice that any objections thereto 2 | were to be filed within fourteen (14) days after service. Ud. at 3.) To date, no objections to the 3 | findings and recommendations have been filed, and the time in which to do so has now passed. 4 Two days after the pending findings and recommendations were issued, on January 15, 5 | 2025, the Supreme Court issued its decision in Royal Canin U. S. A., Inc. v. Wulfschleger, 604 6 | USS. 22 (2025), holding that “[w]hen an amendment excises the federal-law claims that enabled 7 | removal, the federal court loses its supplemental jurisdiction over the related state-law claims. 8 || The case must therefore return to state court.” 604 U.S. at 25. Consequently, the court will adopt 9 | the recommendation that this case be remanded to the Sacramento County Superior Court, while 10 | noting that it lacks discretion to do otherwise pursuant to the Supreme Court’s subsequent 11 | decision in Royal Canin. 12 Accordingly: 13 1. The findings and recommendations issued on January 13, 2025 (Doc.

No. 11) are 14 ADOPTED, as discussed in this order; 15 2. Plaintiff's motion to remand (Doc. No. 8) is GRANTED; 16 3. This action is REMANDED to the Sacramento County Superior Court; and 17 4. The Clerk of the Court is directed to CLOSE this case. 18 IT IS SO ORDERED. | Dated: _ June 9, 2025 Dae A. 2, gel

20 DALE A. DROZD

UNITED STATES DISTRICT JUDGE

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