

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Spears v. El Dorado County

Spears · No. 2:15-cv-0165 DC AC P · Decided May 13, 2025

SUMMARY

The document contains findings and recommendations addressing defendants’ motion for summary judgment in a pro se prisoner civil-rights action against El Dorado County and jail officials. It recommends granting summary judgment for El Dorado County because the plaintiff failed to exhaust available administrative remedies concerning jail lighting and sleep-disrupting conditions, and analyzes the plaintiff’s discriminatory-cell-search claims against defendants Garcia and Handy.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	May 13, 2025
DOCKET	2:15-cv-0165 DC AC P
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations on defendants El Dorado County, Handy, and Garcia's motion for summary judgment in a prisoner civil-rights action under 42 U.S.C. § 1983.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The moving party bears the initial burden of showing the absence of a genuine issue; if the nonmoving party bears the trial burden, the movant may show an absence of evidence supporting the claim. The nonmoving party must identify specific admissible evidence establishing a genuine dispute, and reasonable inferences are drawn in that party's favor. Failure to exhaust under the PLRA is an affirmative defense that defendants must plead and prove.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Brian Spears v. El Dorado County, Handy, Garcia, Kurk

TOPICS

summary judgment

section 1983

prisoners rights

equal protection

civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

federal civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether Spears failed to exhaust available administrative remedies concerning his claim against El Dorado County under the Prison Litigation Reform Act.
2. Whether Spears produced sufficient evidence to create a genuine dispute that Handy and Garcia conducted cell searches with racially discriminatory intent in violation of the Equal Protection Clause.
3. Whether the absence of a Fourth Amendment violation arising from a cell search precludes an equal-protection claim based on discriminatory selection or motivation.

HOLDINGS

1. The administrative grievance process was available to Spears, and because he admittedly did not grieve the claim concerning jail lighting and sleep-disrupting activities, the County was entitled to summary judgment on exhaustion grounds.
2. Spears failed to produce evidence from which a reasonable jury could find that Handy or Garcia searched his cell with racially discriminatory intent; therefore, summary judgment was warranted on those claims.
3. The fact that a prisoner has no reasonable expectation of privacy in a jail cell, and therefore cannot establish an unreasonable-search claim, does not foreclose an equal-protection claim alleging that the search was intentionally discriminatory.

KEY QUOTATIONS

“The summary judgment motion should therefore be granted as to defendant El Dorado County.” (at 24)

“Ultimately, even if defendants’ conduct lacked a valid penological purpose, their conduct did not violate plaintiff’s right to equal protection unless it was done to discriminate against him based on his race, and plaintiff offers no evidence of such motive.” (at 42)

“The claim against defendant El Dorado County should be dismissed without prejudice for failure to exhaust and the claims against defendants Garcia and Handy should be dismissed with prejudice because plaintiff is unable to prove an essential element of his claim.” (at 43)

FACTUAL BACKGROUND

Spears, a former county and current state prisoner, alleged that conditions at the El Dorado County Jail deprived inmates of uninterrupted sleep and that Officers Handy and Garcia subjected him to unusually frequent or severe cell searches because he was African American. Spears had filed twenty jail grievances, but none concerned the

lighting and sleep-disruption claim against the County. In discovery, he did not identify facts or documents beyond his complaint establishing that Handy or Garcia searched his cell with discriminatory intent.

PROCEDURAL HISTORY

The action proceeded on a second amended complaint asserting claims against El Dorado County and several individual defendants. The district court previously dismissed other claims and defendants, denied in part the County's motion to dismiss, and allowed the surviving claims to proceed. After discovery, El Dorado County, Handy, and Garcia moved for summary judgment; following supplemental discovery and briefing, the magistrate judge recommended granting the motion, dismissing the County claim without prejudice for failure to exhaust, dismissing the Handy and Garcia claims with prejudice for lack of evidence of discriminatory intent, and proceeding solely on the claim against Kurk.

DISPOSITION

other

CASES CITED

- King v. Atiyeh, 814 F.2d 565, 567 (9th Cir. 1987)
- Lacey v. Maricopa County, 693 F.3d 896, 928 (9th Cir. 2012) (en banc)
- Thomas v. Ponder, 611 F.3d 1144, 1150 (9th Cir. 2010)
- Jacobsen v. Filler, 790 F.2d 1362, 1364 n.4 (9th Cir. 1986)
- In re Oracle Corp. Securities Litigation, 627 F.3d 376, 387 (9th Cir. 2010)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322-25 (1986)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 586-87 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- T.W. Electric Service, Inc. v. Pacific Electric Contractors Association, 809 F.2d 626, 630 (9th Cir. 1987)
- First National Bank of Arizona v. Cities Service Co., 391 U.S. 253, 288-89 (1968)
- Walls v. Central Contra Costa Transit Authority, 653 F.3d 963, 966 (9th Cir. 2011)
- Richards v. Neilsen Freight Lines, 810 F.2d 898, 902 (9th Cir. 1987)
- Klingele v. Eikenberry, 849 F.2d 409, 411 (9th Cir. 1988)
- Rand v. Rowland, 154 F.3d 952, 960 (9th Cir. 1998) (en banc)
- Porter v. Nussle, 534 U.S. 516, 520 (2002)
- Woodford v. Ngo, 548 U.S. 81, 85 (2006)
- Jones v. Bock, 549 U.S. 199, 204, 216, 219 (2007)
- Hilao v. Estate of Marcos, 103 F.3d 767, 778 n.5 (9th Cir. 1996)
- Booth v. Churner, 532 U.S. 731, 736, 741 & n.6 (2001)
- Lamar v. Sonn, No. 1:23-cv-0462 HBK, 2023 WL 4534869, at *2 (E.D. Cal. July 13, 2023)
- Paul v. Green, 816 F. Supp. 2d 961, 968 (D. Idaho 2011)
- Eckard v. Deshev, No. 19-cv-0580 RSM, 2019 WL 2430675, at *2 (W.D. Wash. June 10, 2019)

- *City of Cleburne v. Cleburne Living Center*, 473 U.S. 432, 439 (1985)
- *Wolff v. McDonnell*, 418 U.S. 539, 556 (1974)
- *Griffin v. County School Board of Prince Edward County*, 377 U.S. 218, 230 (1964)
- *Whren v. United States*, 517 U.S. 806, 813 (1996)
- *Bradley v. United States*, 299 F.3d 197, 205 (3d Cir. 2002)
- *Walker v. Gomez*, 370 F.3d 969, 973 (9th Cir. 2004)
- *Hammler v. Hernandez*, No. 1:19-cv-0616 SKO, 2024 WL 4133910, at *7 (E.D. Cal. Sept. 10, 2024)
- *Beyene v. Coleman Security Services, Inc.*, 854 F.2d 1179, 1181 (9th Cir. 1988)
- *Anheuser-Busch v. Natural Beverage Distributors*, 69 F.3d 337, 345 n.4 (9th Cir. 1995)
- *Fraser v. Goodale*, 342 F.3d 1032, 1036-37 (9th Cir. 2003)
- *Martinez v. Ylst*, 951 F.2d 1153 (9th Cir. 1991)

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