

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Coffer v. Crayton

Coffer · No. 1:25-cv-00356-EPG (PC) · Decided March 27, 2025

SUMMARY

The United States District Court for the Eastern District of California ordered the transfer of Jonathan Christopher Coffer’s 42 U.S.C. § 1983 action to the Northern District of California. The court concluded that none of the defendants resided in the Eastern District and that the claim arose in Monterey County, making venue proper in the Northern District under 28 U.S.C. §§ 1391(b) and 1406(a).

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 27, 2025
DOCKET	1:25-cv-00356-EPG (PC)
DISPOSITION	remanded
PROCEDURAL POSTURE	A state prisoner proceeding pro se filed a civil-rights action under 42 U.S.C. § 1983 in the Eastern District of California. The court determined that venue was improper and transferred the action to the Northern District of California.
PRECEDENTIAL VALUE	Unpublished district-court transfer order; nonprecedential
PARTIES	Jonathan Christopher Coffer v. Eugene Crayton, et al.

TOPICS

- venue
- section 1983
- prisoners rights
- civil procedure

PRACTICE AREAS

- Civil procedure
- Federal civil rights litigation
- Prisoner litigation

QUESTIONS PRESENTED

1. Whether venue was proper in the Eastern District of California under 28 U.S.C. § 1391(b).

2. Whether the action should be transferred to the Northern District of California under 28 U.S.C. § 1406(a) because it was filed in the wrong district.

HOLDINGS

1. Venue was improper in the Eastern District of California because none of the defendants resided there and the claim arose in Monterey County, which is in the Northern District of California.
2. When a complaint is filed in the wrong federal district, the court may transfer it to the proper district in the interest of justice under 28 U.S.C. § 1406(a); here, transfer to the Northern District of California was appropriate.

KEY QUOTATIONS

“The federal venue statute requires that a civil action, other than one based on diversity jurisdiction, be brought only in “(1) a judicial district where any defendant resides, if all defendants are residents of the State in which the district is located, (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of the property that is the subject of the action is situated, or (3) if there is no district in which an action may otherwise be brought as provided in this section, any judicial district in which any defendant is subject to the court’s personal jurisdiction with respect to such action.”” (at 1)

FACTUAL BACKGROUND

Jonathan Christopher Coffey, a state prisoner proceeding without counsel, filed a civil-rights action against Eugene Crayton and other defendants under 42 U.S.C. § 1983. None of the defendants resided in the Eastern District of California. The claim arose in Monterey County, which is located in the Northern District of California.

PROCEDURAL HISTORY

Plaintiff filed a § 1983 complaint in the Eastern District of California. The court found that none of the defendants resided in that district and that the claim arose in Monterey County, located in the Northern District of California. The court transferred the case to the Northern District of California in the interest of justice under 28 U.S.C. § 1406(a).

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter was transferred to the United States District Court for the Northern District of California. The order does not direct any further substantive action.

CASES CITED

- *Starnes v. McGuire*, 512 F.2d 918, 932 (D.C. Cir. 1974)

