

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Wright v. Garrigan

Wright · No. 24-cv-07278-JST · Decided August 21, 2025

SUMMARY

The United States District Court for the Northern District of California denied William L. Wright’s request for reconsideration of the dismissal with prejudice of his Eighth Amendment medical-care action against prison and hospital physicians. The court held that Wright showed no newly discovered evidence, clear error, manifest injustice, or intervening change in controlling law, and that neither reliance on a jailhouse lawyer nor the absence of court-appointed counsel warranted relief. The denial was without prejudice to filing a renewed reconsideration motion accompanied by a proposed second amended complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Jon S. Tigar
JURISDICTION	United States District Court for the Northern District of California
DECIDED	August 21, 2025
DOCKET	24-cv-07278-JST
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought reconsideration under Federal Rules of Civil Procedure 59(e) or 60(b) of the dismissal with prejudice of his prisoner civil-rights action for failure to state a cognizable claim.
STANDARD OF REVIEW	A motion for reconsideration after a final judgment or order may proceed under Rule 59(e) or Rule 60(b); reconsideration is appropriate for newly discovered evidence, clear error or manifest injustice, or an intervening change in controlling law. The decision also applied the exceptional-circumstances standard governing appointment of counsel in civil cases.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown and not designated as precedential in the source.
PARTIES	William L. Wright v. Shannon Garrigan, John Dowbak

TOPICS

motion for reconsideration

prisoners rights

civil rights

section 1983

civil procedure

PRACTICE AREAS

Civil procedure

Prisoner civil rights

Constitutional law

QUESTIONS PRESENTED

1. Whether Wright established grounds for reconsideration of the dismissal with prejudice based on newly discovered evidence, clear error, manifest injustice, or an intervening change in controlling law.
2. Whether the Court was required to appoint counsel sua sponte at the pleading stage because Wright's medical-treatment claims presented exceptional circumstances.
3. Whether reliance on a jailhouse lawyer rendered the dismissal with prejudice unjust.

HOLDINGS

1. Reconsideration was not warranted because Wright identified no newly discovered evidence, clear error, manifest injustice, or intervening change in controlling law supporting vacatur of the dismissal.
2. The Court was not required to appoint counsel sua sponte because Wright did not demonstrate exceptional circumstances warranting appointment of counsel in this civil action.
3. Reliance on a jailhouse lawyer did not make the dismissal with prejudice unjust or excuse the deficient pleadings.

KEY QUOTATIONS

“Reconsideration is appropriate if the district court (1) is presented with newly discovered evidence, (2) committed clear error or the initial decision was manifestly unjust, or (3) if there is an intervening change in controlling law.”

“Plaintiff is responsible for the pleadings which he submits to the Court, whether prepared by counsel, a jailhouse lawyer, or himself.”

FACTUAL BACKGROUND

Wright alleged that medical treatment provided by Garrigan and Dowbak for his right hand and wrist between January 27, 2023, and November 7, 2023, constituted deliberate indifference to serious medical needs. The Court determined that the treatment described in the complaints contradicted allegations that defendants routinely delayed treatment or disregarded a ligament tear. Wright argued that he had relied on an incompetent jailhouse lawyer and that the Court should have appointed counsel sua sponte.

PROCEDURAL HISTORY

Wright sued prison physician Shannon Garrigan and hospital physician John Dowbak, alleging deliberate indifference to serious medical needs in violation of the Eighth Amendment. The Court dismissed the initial complaint with leave to amend, identified pleading deficiencies, and provided guidance concerning the

applicable legal principles. After the amended complaint again failed to state a claim, the Court dismissed the action with prejudice. Wright then moved for reconsideration, which the Court denied without prejudice to filing a renewed motion accompanied by a proposed second amended complaint.

DISPOSITION

other

REMAND INSTRUCTIONS

The request for reconsideration was denied without prejudice to filing a renewed motion accompanied by a proposed second amended complaint. The case remained closed.

CASES CITED

- Am. Ironworks & Erectors v. N. Am. Constr. Corp., 248 F.3d 892, 898-99 (9th Cir. 2001)
- McDowell v. Calderon, 197 F.3d 1253, 1255 n.3 (9th Cir. 1999)
- School Dist. No. 1K, Multnomah Cty., Or. v. ACandS, Inc., 5 F.3d 1255, 1262 (9th Cir. 1993)
- Kona Enters., Inc. v. Est. of Bishop, 229 F.3d 877, 890 (9th Cir. 2000)
- Powell v. Basto, 2020 U.S. Dist. LEXIS 78123 (S.D. Cal.)
- Tacho v. Martinez, 862 F.2d 1376, 1381 (9th Cir. 1988)
- Lassiter v. Dep't of Social Svcs., 452 U.S. 18, 25 (1981)
- Wilborn v. Escalderon, 789 F.2d 1328, 1331 (9th Cir. 1986)
- Agyeman v. Corrections Corp. of America, 390 F.3d 1101, 1103 (9th Cir. 2004)