

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jonathan Christopher Coffey v. Jose Duron, et al.

No. 2:25-cv-01296-EFB (PC) · No. 2:25-cv-01296-EFB (PC) · Decided September 17, 2025

SUMMARY

The United States District Court for the Eastern District of California determined that the plaintiff's § 1983 claim arose in Monterey County, within the Northern District of California. The court transferred the action to the Northern District of California under 28 U.S.C. § 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	September 17, 2025
DOCKET	2:25-cv-01296-EFB (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a state prisoner proceeding pro se, filed a civil rights action under 42 U.S.C. § 1983. The district court determined that venue was improper in the Eastern District of California and ordered transfer to the Northern District of California.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated.

TOPICS

venue civil procedure section 1983

PRACTICE AREAS

Civil procedure Prisoner civil rights

QUESTIONS PRESENTED

- Whether venue was proper in the Eastern District of California under 28 U.S.C. § 1391(b).
- Whether the action should be transferred to the Northern District of California under 28 U.S.C. § 1406(a) because the claim arose in Monterey County.

HOLDINGS

1. Venue was improper in the Eastern District of California because the claim arose in Monterey County, which is located in the Northern District of California.
2. When a civil action 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).

KEY QUOTATIONS

“may be brought in (1) a judicial district in which 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 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 action, any judicial district in which any defendant is subject to the court’s personal jurisdiction with respect to such action.” (at 1)

FACTUAL BACKGROUND

Plaintiff is a state prisoner who brought a civil-rights action under 42 U.S.C. § 1983. The court determined that the claim arose in Monterey County, California. Because Monterey County lies within the Northern District of California, the court concluded that the action had been filed in the wrong federal district.

PROCEDURAL HISTORY

Jonathan Christopher Coffey filed a prisoner civil-rights complaint in the Eastern District of California. The court concluded that the claim arose in Monterey County, within the Northern District of California, and transferred the matter in the interest of justice under 28 U.S.C. § 1406(a).

DISPOSITION

other

REMAND INSTRUCTIONS

The matter was transferred to the United States District Court for the Northern District of California.

CASES CITED

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