

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

John W. Williams v. Beer, et al.

Williams v. Beer, No. 1:21-cv-00155-KES-EPG (PC) (E.D. Cal. Oct. 30, 2025) · No. 1:21-cv-00155-KES-EPG (PC) · Decided October 30, 2025

SUMMARY

The United States District Court for the Eastern District of California denied Plaintiff John W. Williams’s motion to limit the scope of a subpoena issued to Atascadero State Hospital for medical, mental-health, and disciplinary records. The court concluded that Plaintiff had waived confidentiality concerns regarding medical records by placing his physical and psychological injuries at issue, and that the subpoena was sufficiently limited and relevant to the claims and defenses.

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	October 30, 2025
DOCKET	1:21-cv-00155-KES-EPG (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a state prisoner proceeding under 42 U.S.C. § 1983, moved to limit the scope of defendants' subpoena to Atascadero State Hospital seeking medical, mental-health, and disciplinary records. The court denied the motion and authorized production or review of the records.
STANDARD OF REVIEW	The court applied the standards governing objections to nonparty subpoenas under Federal Rule of Civil Procedure 45, including standing based on a personal right or privilege and undue burden. Undue burden is evaluated by balancing relevance, need, breadth, time period, particularity, and burden.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	John W. Williams v. Beer, et al.

TOPICS

- discovery dispute
- medical records privacy
- civil procedure
- prisoners rights
- section 1983

PRACTICE AREAS

civil procedure

prisoner civil rights

discovery

medical records privacy

QUESTIONS PRESENTED

1. Whether plaintiff had a valid basis to limit or quash a subpoena directed to a nonparty hospital seeking his medical, mental-health, and disciplinary records.
2. Whether plaintiff's claims for physical and psychological injuries and damages waived confidentiality or privacy objections concerning the subpoenaed medical records.
3. Whether the subpoena imposed an undue burden or was overbroad, duplicative, or otherwise improper under Federal Rule of Civil Procedure 45.
4. Whether a prior order in an unrelated case and the clean-hands doctrine required limiting the subpoena.

HOLDINGS

1. A party generally lacks standing to object to a subpoena served on a nonparty, but may object when the subpoena implicates the party's personal right or privilege or imposes an undue burden on the party.
2. A party waives a general privacy or confidentiality objection to medical records when the party places physical or mental health at issue and seeks damages for those injuries.
3. The subpoena did not impose an undue burden warranting limitation because it sought relevant records for a limited period, described the requested materials with particularity, and imposed no production burden on plaintiff.
4. The prior order in the unrelated case did not justify limiting the subpoena, and plaintiff failed to develop an argument showing that the clean-hands doctrine applied.

KEY QUOTATIONS

“As a general rule, a party “lacks standing to object to a subpoena issued to a nonparty witness” because of “the principle that the person served with process is the proper party to allege error.” (III.A)

“Thus, Plaintiff has waived any confidentiality concerns as to the medical records at issue.” (III.B)

FACTUAL BACKGROUND

Plaintiff alleges that prison officials assaulted him without provocation in August 2019 and subsequently denied him medical care, causing physical and psychological injuries. He asserts Eighth Amendment claims for excessive force, failure to protect, sexual assault, and deliberate indifference to serious medical needs, and seeks monetary damages. Defendants subpoenaed Atascadero State Hospital for plaintiff's medical, mental-health, and disciplinary records from his December 2019 to January 2020 stay.

PROCEDURAL HISTORY

The action concerns alleged Eighth Amendment violations arising from an August 2019 prison assault and the subsequent denial of medical care. The case was stayed from April 2022 through June 2025 while a related state

criminal case proceeded. Defendants later subpoenaed Atascadero State Hospital for records concerning plaintiff's stay there from December 11, 2019, through January 24, 2020. Plaintiff moved to limit the subpoena; after briefing, the court denied the motion and vacated its prior temporary instruction withholding or segregating the records.

DISPOSITION

other

CASES CITED

- United States v. Viltrakis, 108 F.3d 1159, 1161 (9th Cir. 1997)
- In re Grand Jury Subpoenas Dated Dec. 10, 1987, 926 F.2d 847, 852 (9th Cir. 1991)
- Crispin v. Christian Audigier, Inc., 717 F. Supp. 2d 965, 973 (C.D. Cal. 2010)
- Televisa, S.A. de C.V. v. Univision Commc'ns, Inc., No. CV 05-3444 PSGMANX, 2008 WL 4951213, at *1-*2 (C.D. Cal. Nov. 17, 2008)
- Christin v. Wal-Mart Assocs., Inc., No. 1:24-CV-00619-KES-SAB, 2025 WL 391013, at *3 (E.D. Cal. Feb. 3, 2025)
- Canton v. U.S. Foods, Inc., No. 22-CV-04226-TLT (LJC), 2023 WL 4053798, at *2 (N.D. Cal. June 16, 2023)
- Williams v. Black, No. 2:20-cv-4300-PSG-MAA

OPINION

1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA
9 10 JOHN W. WILLIAMS, Case No. 1:21-cv-00155-KES-EPG (PC) 11 Plaintiff, ORDER
DENYING PLAINTIFF’S MOTION 12 TO LIMIT SCOPE OF SUBPOENA v. 13 (ECF No. 113)
BEER, et al., 14 Defendants. 15 16 I. INTRODUCTION 17 Plaintiff John Williams is a state
prisoner proceeding pro se in this civil action filed 18 pursuant to 42 U.S.C. § 1983.1 This case
proceeds on Plaintiff’s Eighth Amendment excessive 19 force claim against Defendant Oaks;
Plaintiff’s Eighth Amendment failure to protect claim 20 against Defendant Pascoe; Plaintiff’s
Eighth Amendment sexual assault claim against Defendant 21 Oaks; and Plaintiff’s Eighth
Amendment claim for deliberate indifference to his serious medical 22 needs against Defendants
Oaks, Pascoe, Riddle, Beer, Garcia, and Cubos.

(ECF No. 25, pp. 2-3). 23 Generally, these allegations stem from an alleged unprovoked assault on
Plaintiff by prison 24 25 26 27 1 Plaintiff is not proceeding in forma pauperis; he paid the filing
fee. (See docket entries on March 15 and 28 24, 2021). 1 officials in August 2019, and Plaintiff’s
subsequent denial of medical care for his injuries. (See 2 ECF No. 10, pp. 3-7).2 3 Now before the
Court is Plaintiff’s motion and request for a court order to limit the scope 4 of a subpoena that
Defendants issued to Atascadero State Hospital regarding Plaintiff’s mental health treatment
records and disciplinary records.

(ECF No. 113). As explained below, the Court 5 will deny Plaintiff's motion. 6 II. PLAINTIFF'S MOTION 7 A. Parties' Filings 8 Plaintiff's motion, filed September 15, 2025, asks "the Court for an order to limit the 9 scope of [the] subpoena served by Defendants on about August 29, 2025, on Atascadero State 10 Hospital (ASH) for medical and mental health treatment records as well as [his] disciplinary 11 records relative to Plaintiff's stay at ASH from December 11, 2019, thru January 24, 2020."3 12 (ECF No. 113, pp. 1-2).

Plaintiff generally argues that the requested documents are privileged or 13 otherwise outside the scope of discovery. Further, he states that the documents "should be 14 screened by the doctrine of unclean hands" based on a review of the records in a Central District 15 of California case, *Williams v. Black*, 2:20-cv-4300-PSG-MAA. 16 Plaintiff's motion attached a subpoena to the Custodian of Records, Atascadero State 17 Hospital.

The subpoena commands Atascadero State Hospital to produce the following 18 documents to the Office of the California Attorney General: 19 1. All medical records and reports, including but not limited to, physician's 20 notes, nurses' notes, orders for treatment, records of physical examinations, and 21 refusals of treatment or examination, and mental treatment or progress notes pertaining to John Wesley Williams (CDCR No. V34099) from December 11, 22 2019 through January 24, 2020.

23 2. Any disciplinary records, reports or violations issued to John Wesley Williams (CDCR No. V34099) issued or created at Atascadero State Hospital 24 between December 11, 2019 through January 24, 2020. 25 2 This case was stayed from April 2022 until June 2025 while Plaintiff's related criminal case—alleging 26 that he assaulted Defendant Oaks in connection with the August 2019 events—proceeded in state court, with the case ultimately being dismissed following Plaintiff's mental health diversion plea.

(See ECF Nos. 27 45, 53, 89, 94). 3 For readability, the Court has made minor changes to Plaintiff's quotations, such as changing 28 capitalization, without specifying each change. 1 (ECF No. 113, at p. 11). 2 On September 16, 2025, the Court set a deadline for Defendants to respond to Plaintiff's 3 motion, directed the Clerk of Court to serve a copy of the order on ASH, and directed ASH to 4 withhold production of the documents until the Court issued a further order.

(ECF No. 114, pp. 1- 2). Alternatively, the Court noted that, if Defendants had already received these records from 5 ASH, they should segregate and not review them until further order of the Court. (Id. at 2). 6 Defendants timely opposed Plaintiff's motion on September 30, 2025, arguing that the 7 documents are relevant to Plaintiff's claims, Plaintiff failed to show why the subpoena should be 8 limited, and the Central District case does not prohibit disclosure of the documents.

(ECF No. 9 118). 10 Plaintiff filed his reply on October 9, 2025, arguing that the medical records should not be 11 produced because Defendants have separately issued discovery requests to him

for his mental health records, and thus the subpoena is duplicative and repetitive and imposes a burden on him. 13 (ECF No. 122, p. 2). 14 III. DISCUSSION 15 a. Legal Standards 16 A party may obtain information from a non-party in a case by serving a subpoena.

Fed. R. 17 Civ. P. 45. As a general rule, a party “lacks standing to object to a subpoena issued to a nonparty 18 witness” because of “the principle that the person served with process is the proper party to allege 19 error.” *United States v. Viltrakis*, 108 F.3d 1159, 1161 (9th Cir. 1997); see *In re Grand Jury 20 Subpoenas Dated Dec. 10, 1987*, 926 F.2d 847, 852 (9th Cir.

1991) (“The subpoenas do not seek 21 documents pertaining to Doe Two. Neither are the subpoenas directed to him. Thus, he lacks 22 standing to challenge the subpoenas.”). There are limited exceptions to this rule; for example, a 23 party may object to a subpoena when the party has a personal right or privilege regarding the information held by the non-party or it imposes an undue burden.

See *Crispin v. Christian 24 Audigier, Inc.*, 717 F. Supp. 2d 965, 973 (C.D. Cal. 2010) (collecting cases); *Televisa, S.A. de 25 C.V. v. Univision Commc’ns, Inc.*, No. CV 05-3444 PSGMANX, 2008 WL 4951213, at *1 (C.D. 26 Cal. Nov. 17, 2008) (“However, a party has standing to move to quash a subpoena only if it 27 alleges that the information sought is privileged or the subpoena subjects the moving party to 28 1 undue burden.

Otherwise put, a party may not quash a subpoena served upon a non-party on any 2 grounds other than privilege.”) (citation omitted). 3 To determine whether a subpoena constitutes an undue burden, courts balance six factors: (1) the relevance of the information requested; (2) the need of the party for 4 production; (3) the breadth of the request for production; (4) the time period covered by the subpoena; (5) the particularity with which the subpoena describes 5 the requested production; and (6) the burden imposed.

6 *Televisa, S.A. de C.V.*, 2008 WL 4951213, at *2. 7 B. Analysis 8 Plaintiff first argues that the subpoenaed documents “require disclosure of privileged or 9 other protected matter” but he fails to specify privilege. (ECF No. 113, p. 2). He cites Federal 10 Rule of Civil Procedure 45(d)(3)(A) (iii), which authorizes “the court for the district where compliance is required”⁴ to quash or modify subpoenas that “require[] disclosure of privileged or 11 other protected matter, if no exception or waiver applies.” 12 While the Court recognizes that, as a general matter, a person’s medical records may 13 contain confidential information, “[a] party may waive [his] general right to privacy as to medical 14 records if [he] puts their contents at issue in a case.” *Christin v. Wal-Mart Assocs., Inc.*, No. 1:24- 15 CV-00619-KES-SAB, 2025 WL 391013, at *3 (E.D.

Cal. Feb. 3, 2025). 16 As Defendants argue, “[i]n his complaint, Plaintiff alleges injury for ‘post-traumatic 17 stress’ and ‘psychological duress’ and physical injury.” (ECF No. 118, p. 2) (citing

ECF No. 1, p. 18 4). Additionally, Plaintiff seeks monetary damages as part of his request for relief. (ECF No. 1, p. 19 7).

Thus, Plaintiff has waived any confidentiality concerns as to the medical records at issue. See 20 Canton v. U.S. Foods, Inc., No. 22-CV-04226-TLT (LJC), 2023 WL 4053798, at *2 (N.D. Cal. 21 June 16, 2023) (“But there is undoubtedly a waiver if the party brings claims concerning physical 22 or mental health injuries and then seeks damages for those injuries.”).

23 Plaintiff’s next argument cites findings and recommendations on a motion for summary 24 judgment against unrelated defendants from his case in the Central District (Williams v. Black, 25 2:20-cv-4300-PSG-MAA) as a basis to quash the subpoena. Specifically, he cites the following 26 passage discussing Plaintiff’s First Amendment retaliation claim in that case: 27 4 The Court notes that the subpoena issued to ASH requires production in Sacramento, California, which is 28 within this District.

1 Making all inferences in Plaintiffs favor, Plaintiff’s proffered circumstantial evidence—of suspect timing, opposition to speech, and evidence calling into 2 question Defendants’ stated reason for discharging Plaintiff to CDCR—create a genuine dispute of material fact as to whether Defendants acted with a retaliatory 3 motive in discharging Plaintiff from DSH-A to CDCR.

4 (ECF No. 113, p. 2, 24). Plaintiff then asserts that the documents should not be produced under 5 “the doctrine of unclean hands.” (Id. at 2). 6 The Court finds that the order does not warrant limiting the subpoena here.

First, even 7 assuming that the same records were at issue in the Central District case, the cited opinion did not 8 address whether such documents should be produced or not under a subpoena; rather, the Central 9 District case concerned whether summary judgment was warranted for the different defendants 10 in that case.

Second, the clean-hands doctrine is “[t]he principle that a party cannot seek equitable 11 relief or assert an equitable defense if that party has violated an equitable principle, such as good 12 faith. Such a party is described as having ‘unclean hands.’” CLEAN-HANDS DOCTRINE, Black’s Law Dictionary (12th ed. 2024). Plaintiff provides no developed argument as to how this 13 principle applies here.

14 Lastly, Plaintiff argues that, because Defendants have generally requested his medical 15 records in discovery, the production of the documents at issue in the subpoena would be 16 “duplicative and repetitive “and impose “a burden” on him. (ECF No. 122, p. 2).

The Court 17 disagrees. 18 The subpoena is limited to medical and disciplinary records spanning a limited time 19 period from December 11, 2019 through January 24, 2020. (ECF No. 113, p. 11). This time 20 period is very shortly after the August 2019 events recounted in the complaint and

Plaintiff's 21 medical records could be relevant, among other things, to the extent of his alleged injuries he 22 suffered in this case.

23 Further, Plaintiff's disciplinary records may be relevant to Defendants' potential defense 24 that Plaintiff's conduct in this case was part of an "extensive history of rules violations in prison." 25 (ECF No. 118, p. 4). 26 And because the subpoena is directed to ASH, Plaintiff has no burden imposed on him to 27 produce the documents; rather, ASH will produce the records.

28 Accordingly, the Court will deny Plaintiff's motion to limit the scope of the subpoena. 1 IV. CONCLUSION AND ORDER 2 For the reasons explained above, IT IS ORDERED as follows: 3 1. Plaintiff's Motion for a Court Order to Limit the Scope of Subpoena is DENIED. (ECF 4 No. 113). 5 a. The Court vacates its previous instruction that the legal coordinator or appropriate 6 official for Atascadero State Hospital withhold production of documents, or, in the 7 event that Defendants have already received these records from Atascadero State 8 Hospital, that they should segregate the documents and not review them.

(ECF No. 9 114, p. 2). b. Atascadero State Hospital may produce the documents, or Defendants may review 8 them if they are already in their possession. 2. The Clerk of Court is ordered to send a copy of this order to Department of State 2 Hospitals — Atascadero at the following address: P.O. Box 7001, Atascadero, CA, 93423- 13 7001. 14 15 | SO ORDERED. | Dated: _ October 30, 2025 [sf Sy □ 17 UNITED STATES MAGISTRATE JUDGE 18 19 20 21 22 23 24 25 26 27 28