

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PRECEDENTIAL VALUE	nonprecedential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