

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Michael Manjeet Singh v. Pheiffer, et al.

Singh v. Pheiffer · No. 1:22-cv-01412-KES-EPG (PC) · Decided December 3, 2025

SUMMARY

The United States District Court for the Eastern District of California partially overruled defendants’ objections based on the official information privilege to producing investigative documents and recordings in a prisoner civil rights action. The court ordered production of specified interview summaries, a photograph, a disability/accommodation summary, and several staff interview recordings, subject to redaction of investigative analyses and personnel information. The court permitted defendants to withhold other inmate interview materials and a recording containing unrelated investigative information.

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	December 3, 2025
DOCKET	1:22-cv-01412-KES-EPG (PC)
DISPOSITION	other
PROCEDURAL POSTURE	The court ruled on defendants’ objections to producing investigative documents and audio recordings in discovery based on the official information privilege, after conducting in camera review.
STANDARD OF REVIEW	For the official information privilege, the court conducted in camera review and balanced the potential benefits of disclosure against the potential disadvantages. Discovery relevance was evaluated under Federal Rule of Civil Procedure 26(b)(1).
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- discovery dispute
- privilege
- prisoners rights
- section 1983
- civil procedure

PRACTICE AREAS

- Civil procedure
- Federal civil-rights litigation
- Prisoner litigation
- Discovery privilege

QUESTIONS PRESENTED

1. Whether the official information privilege required withholding the prison grievance-investigation materials and interview recordings from discovery.
2. Whether the relevance of direct witness accounts, a photograph, and a disability/accommodation summary outweighed the asserted confidentiality, safety, retaliation, and investigative-integrity concerns.
3. Which portions of the investigative materials were subject to production and which could be withheld or redacted.

HOLDINGS

1. The official information privilege is qualified in this federal civil-rights discovery dispute, and its application requires in camera review and balancing the benefits of disclosure against the potential disadvantages.
2. Defendants must produce the interview summaries of Plaintiff and identified CDCR staff, Plaintiff's photograph, Plaintiff's disability/accommodation summary, and the audio recordings of interviews with Pinedo, Dillard, Diaz, Vieth, and Fowler, subject to permitted redactions.
3. Defendants may withhold the audio recordings and written summaries of other inmate witnesses, Captain Waddle's audio recording, institutional analyses and opinions, and CDCR personnel and contact information because the disadvantages of disclosure outweigh their relevance.

KEY QUOTATIONS

"The "common law governmental privilege (encompassing and referred to sometimes as the official or state secret privilege) . . . is only a qualified privilege, contingent upon the competing interests of the requesting litigant and subject to disclosure." (at 3)

"After weighing the potential benefits with disadvantages of disclosure, the Court finds that Defendants are entitled to withhold the audio recordings and written summaries of other inmates, the audio recording of Waddle's interview, and the institution's analyses, opinions, and CDCR personnel and contact information under the official information privilege because the potential disadvantages of disclosure outweigh the relevance of the documents to the litigation." (at 7)

FACTUAL BACKGROUND

Plaintiff alleges that correctional officers took his wheelchair and kicked and struck him in the head while he was on the ground. He alleges that he was unable to use his wheelchair to board an ambulance and was thereby denied medical treatment. The requested materials consisted of prison grievance-investigation reports, witness interview summaries and recordings, a photograph, and a disability/accommodation summary concerning the incident.

PROCEDURAL HISTORY

Plaintiff, a state prisoner proceeding pro se and in forma pauperis, filed this 42 U.S.C. § 1983 action in 2022. The case was transferred from the Northern District of California to the Eastern District of California on November 2, 2022, and discovery opened on June 4, 2025. Defendants objected to producing an internal grievance-allegation investigation report and eight interview recordings; the court overruled the objections in part and sustained them in part.

DISPOSITION

other

CASES CITED

- Kerr v. U.S. Dist. Ct. for the N. Dist. of Cal., 511 F.2d 192, 197-98 (9th Cir. 1975), aff'd, 426 U.S. 394 (1976)
- Breed v. U.S. Dist. Ct. for the N. Dist. of Cal., 542 F.2d 1114, 1116 (9th Cir. 1976)
- Sanchez v. City of Santa Ana, 936 F.2d 1027, 1033-34 (9th Cir. 1991)
- Woodford v. Ngo, 548 U.S. 81, 94-95 (2006)

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