

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

James v. County of Sacramento

No. 2:22-cv-2193-DAD-JDP (P), Order; Findings and Recommendations (E.D. Cal. Aug. 18, 2025) · No. 2:22-cv-2193-DAD-JDP (P) · Decided August 18, 2025

SUMMARY

The United States District Court for the Eastern District of California denied plaintiff’s motions for issuance of a subpoena, discovery and injunctive relief, and recusal. The court also denied defendants’ motion to modify the scheduling order without prejudice, construed plaintiff’s filing as a notice of voluntary dismissal as to defendant Babu, and directed defendants to confer regarding allegedly lost discovery. The court recommended denying any request for injunctive relief contained in plaintiff’s discovery motion.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 18, 2025
DOCKET	2:22-cv-2193-DAD-JDP (P)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, proceeding under 42 U.S.C. § 1983, moved for issuance of a subpoena, discovery-related relief and a permanent injunction, and recusal. Defendants moved to modify the scheduling order to extend the discovery deadline. The magistrate judge denied the motions and issued findings and recommendations that the request for injunctive relief be denied, subject to review by the assigned district judge.
PRECEDENTIAL VALUE	Unknown; district court order and findings and recommendations with no reporter citation
PARTIES	Ronald Eugene James v. County of Sacramento, Saucedo, Little, John Doe 2, Lynette, Alana, Babu, Kuzmenko, unnamed deputies

TOPICS

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

PRACTICE AREAS

civil procedure

civil rights

prisoner civil rights

injunctive relief

QUESTIONS PRESENTED

1. Whether defendants showed sufficient cause to extend the discovery deadline after discovery had closed.
2. Whether plaintiff established a basis for issuance of a subpoena for medical records.
3. Whether plaintiff's request for injunctive relief was sufficiently defined and related to the claims in the action.
4. Whether the magistrate judge should recuse based on alleged delay in ruling on motions and the requirement that plaintiff provide defense counsel a copy of his subpoena.
5. Whether plaintiff's opposition should be construed as a notice of voluntary dismissal of his claims against defendant Babu.

HOLDINGS

1. A request to extend discovery may be denied without prejudice when the moving party does not identify specific outstanding discovery that warrants an extension.
2. A subpoena request may be denied without prejudice when the requesting party fails to explain how the requested records are relevant to the claims at issue.
3. A request for injunctive relief should be denied when its contours are unclear, the movant does not address the injunction factors, or the requested relief is insufficiently related to the injury alleged in the underlying complaint.
4. A judge's alleged delay in ruling on motions and requirement that a party provide a subpoena to opposing counsel do not establish a basis for recusal without a showing of prejudice or a legally sufficient ground for disqualification.
5. The court may construe a plaintiff's filing as a notice of voluntary dismissal when the filing indicates that plaintiff intended to dismiss the defendant.

KEY QUOTATIONS

“A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest.” (at 3)

“[T]here must exist a relationship between the injury claimed in a motion for injunctive relief and the conduct alleged in the underlying complaint.” (at 3)

FACTUAL BACKGROUND

Plaintiff alleges that defendants used excessive force and later failed to provide medical care in connection with events in 2022. He sought 2019 MRI records from Kaiser South Sacramento Hospital but did not explain their relevance to the claims proceeding in the action. Plaintiff also alleged that discovery mailed by defendants was

discarded by correctional officers at North Kern State Prison and sought injunctive relief relating to that alleged loss.

PROCEDURAL HISTORY

The court previously determined that plaintiff's sixth amended complaint stated viable excessive-force and failure-to-provide-medical-care claims against several defendants. After discovery closed, defendants sought an extension to permit defendant Babu to appear, while plaintiff sought records from Kaiser South Sacramento Hospital, relief concerning allegedly lost discovery, a permanent injunction, and recusal. The magistrate judge denied the motions, construed plaintiff's opposition as a notice of voluntary dismissal of his claims against Babu, directed that Babu be terminated, and recommended denial of injunctive relief.

DISPOSITION

other

CASES CITED

- Winter v. NRDC, Inc., 555 U.S. 7, 20 (2008)
- Pac. Radiation Oncology, LLC v. Queen's Med. Ctr., 810 F.3d 631, 638 (9th Cir. 2016)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Yist, 951 F.2d 1153 (9th Cir. 1991)