

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Thurl H. Light, II v. Officer D. Sotaso

Light v. Sotaso · No. 1:24-cv-01508-JLT-HBK (PC) · Decided December 8, 2025

SUMMARY

The United States District Court for the Eastern District of California denied without prejudice Plaintiff Thurl H. Light, II’s motion to subpoena evidence. The court concluded that the requested documents could likely be sought from Defendant Officer D. Sotaso through the discovery process after discovery begins, and directed the Clerk to correct the docket to identify Officer Sotaso as the sole defendant.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 8, 2025
DOCKET	1:24-cv-01508-JLT-HBK (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a pro se pretrial detainee, moved for issuance of a subpoena duces tecum seeking video, medical, incident-report, and mental-health records while defendant's motion to dismiss remained pending.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status unknown.
PARTIES	Thurl H. Light, II v. Officer D. Sotaso

TOPICS

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

PRACTICE AREAS

- civil procedure
- prisoner civil rights

QUESTIONS PRESENTED

1. Whether the court should issue a subpoena duces tecum for records relating to plaintiff's civil-rights claim while defendant's motion to dismiss remained pending.
2. Whether the requested documents should first be sought from the defendant through a request for production under Federal Rule of Civil Procedure 34.

HOLDINGS

1. The court denied plaintiff's motion for a subpoena without prejudice because the requested documents appeared obtainable through the ordinary discovery process from the named defendant, and no discovery and scheduling order had yet issued while the pleadings remained open.

KEY QUOTATIONS

“As a rule, a subpoena primarily is a mechanism for obtaining discovery and testimony from non-parties.” (at 2)

“If, however, after making such a request upon the named defendant, defendant refuses to produce such documents because they do not have access or the legal right to obtain such documents, Plaintiff may renew his request for an issuance of a subpoena.” (at 3)

FACTUAL BACKGROUND

Plaintiff, a pretrial detainee housed at the Fresno County Jail, sought records concerning the incident underlying his failure-to-protect claim, including a May 2, 2024 video, medical records, an incident report, and mental-health records. Defendant Sotaso was an employee of the Fresno County Sheriff's Office and opposed the subpoena motion. The court found that the requested documents appeared potentially obtainable from the named defendant through ordinary discovery after discovery commenced.

PROCEDURAL HISTORY

Plaintiff filed a first amended civil-rights complaint alleging a Fourteenth Amendment failure-to-protect claim against Officer D. Sotaso. The court screened the complaint, defendant moved to dismiss, and the motion remained pending. Plaintiff then moved to subpoena evidence and for summary judgment; the court denied the subpoena motion without prejudice and directed the clerk to correct the docket caption to identify Officer Sotaso as the sole defendant.

DISPOSITION

other

CASES CITED

- Allen v. Woodford, 2007 WL 309945, at *2 (E.D. Cal. 2007)
- States v. International Union of Petroleum & Industrial Workers, AFL-CIO, 870 F.2d 1450, 1452 (9th Cir. 1989)

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