

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ralph Coleman, et al. v. Gavin Newsom, et al.

Coleman · No. 2:90-cv-0520 KJM SCR P · Decided August 21, 2025

SUMMARY

The United States District Court for the Eastern District of California ordered defendants in Coleman v. Newsom to maintain the current active licensure of all inpatient and mental health crisis beds. The court exercised its inherent authority to preserve the status quo for fourteen days or until further order while considering plaintiffs’ request concerning defendants’ planned bed deactivations.

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	August 21, 2025
DOCKET	2:90-cv-0520 KJM SCR P
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs requested leave to file a motion seeking an order requiring defendants to maintain the existing number of licensed psychiatric inpatient and mental health crisis beds. The court treated the parties' filings and responses as presenting the substance of the proposed relief and issued a temporary status quo order.
PRECEDENTIAL VALUE	nonprecedential district court order
PARTIES	Ralph Coleman, et al. v. Gavin Newsom, et al.

TOPICS

- injunctions
- prisoners rights
- civil procedure
- equitable relief
- remedies

PRACTICE AREAS

- civil rights
- prisoner mental health
- federal civil procedure
- equitable relief

QUESTIONS PRESENTED

1. Whether the court could exercise its inherent authority to require defendants to maintain the status quo by temporarily preventing deactivation of licensed psychiatric inpatient and mental health crisis beds.

2. Whether a fourteen-day status quo order was a reasonable response to the specific problem presented and consistent with express rules and statutes.

HOLDINGS

1. A federal district court may exercise its inherent power to control the disposition of cases on its docket by temporarily maintaining the status quo when the order is a reasonable response to a specific problem and does not contradict an express rule or statute.
2. Defendants must maintain the current active licensure of all inpatient and mental health crisis beds and may not proceed with the planned deactivation for fourteen days or until further order of the court.

KEY QUOTATIONS

“The exercise of that inherent power “must be a reasonable response to a specific problem and the power cannot contradict any express rule or statute.”” (at 2)

“To the contrary, economy of time and effort for everyone involved—the court, a possible Receiver, the parties, and counsel—are best served by the court’s exercise of its inherent authority to maintain the status quo for a period of fourteen days while it considers the totality of the record now before the court on this important issue” (at 3)

“IT IS HEREBY ORDERED that defendants shall maintain the current active licensure of all inpatient and mental health crisis beds and not proceed with their planned deactivation of those beds for a period of fourteen days or until further order of the court.” (at 3)

FACTUAL BACKGROUND

Defendants planned to deactivate inpatient mental health and mental health crisis beds at California correctional facilities, initially identifying 305 beds and later planning to indefinitely deactivate 249 male inpatient beds and 20 mental health crisis beds. Plaintiffs sought to preserve the existing bed capacity while the court considered issues related to a possible receivership and the proposed deactivation. The court found that the plans raised substantial questions it could not resolve within the proposed timeframe and that no irreparable harm or serious inequity was identified from temporarily preserving the beds.

PROCEDURAL HISTORY

On July 28, 2025, plaintiffs requested leave to file a motion concerning defendants' planned deactivation of inpatient mental health beds and mental health crisis beds. Defendants filed an opposition and two amended oppositions, and declined the court's request to voluntarily pause the planned deactivation. The court ordered defendants to maintain the current active licensure of all such beds for fourteen days or until further order.

DISPOSITION

other

CASES CITED

- CMAX, Inc. v. Hall, 300 F.2d 265, 268 (9th Cir. 1962)
- Dietz v. Bouldin, 579 U.S. 40, 45 (2016)
- Link v. Wabash R. Co., 370 U.S. 626, 630-31 (1962)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF
CALIFORNIA 10 11 RALPH COLEMAN, et al., No. 2:90-cv-0520 KJM SCR P 12 Plaintiffs,
ORDER 13 v. 14 | GAVIN NEWSOM, et al., 1S Defendants. 16 17 On July 28, 2025, plaintiffs
filed a request for leave to file a motion for a court order 18 | requiring defendants to maintain the
present number of licensed psychiatric inpatient beds 19 | “pending appointment of a Receiver or
further order of the Court.” ECF No. 8710 at 2.

20 | Defendants have filed an opposition and two amended oppositions to plaintiffs’ request, most
21 | recently on August 11, 2025. ECF Nos. 8711, 8719, 8728. Plaintiffs’ request arises from 22 |
defendants’ plan to deactivate a number of inpatient mental health beds on August 22, 2025. 23 |
When plaintiffs filed their request, defendants planned to deactivate 305 inpatient and mental 24 |
health crisis beds (MHCBs).

Second Amended Decl. of Mehta, ECF No. 8728-1 at 2. Currently, 25 | defendants plan to
“indefinitely deactivate” 249 male inpatient beds and 20 MHCBs. Also on 26 | August 22, 2025,
the court has a hearing scheduled to discuss issues related to the proposed 27 | Receivership Action
Plan. Aug. 19, 2025 Minute Order, ECF No. 8743. 28 | // 1 On August 20, 2025, the court
directed defendants to inform the court by 5:00 p.m. on the 2 same day whether they would
“voluntarily pause the bed deactivation for fourteen days to allow 3 the court to fully consider all
of the information now before it related to” the planned deactivation 4 and plaintiffs’ request.

Aug. 19, 2025 Minute Order, ECF No. 8743. At 3:46 p.m. defendants 5 filed a response stating
they will not voluntarily pause the bed deactivation. ECF No. 8746.1 6 “A district court has
inherent power to control the disposition of the causes on its docket 7 in a manner which will
promote economy of time and effort for itself, for counsel, and for 8 litigants.” CMAX, Inc. v.
Hall, 300 F.2d 265, 268 (9th Cir.

1962); see also Dietz v. Bouldin, 9 579 U.S. 40, 45 (2016) (quoting Link v. Wabash R. Co., 370
U.S. 626, 630-31 (1962) (courts have 10 “inherent powers that are ‘governed not by rule or statute
but by the control necessarily vested in 11 courts to manage their own affairs so as to achieve the
orderly and expeditious disposition of 12 cases.’”).

The exercise of that inherent power “must be a reasonable response to a specific 13 problem and
the power cannot contradict any express rule or statute.” Dietz, id. 14 The court finds an order
maintaining the status quo for a short time would be a reasonable 15 response to a specific

problem and would not contradict any express rule or statute; as the court 16 understands it, such an order is within the authority Congress has given all federal courts.

Cf. 17 28 U.S.C. § 1651(a) (“[A]ll courts established by an Act of Congress may issue all writs 1 The court takes notice of the California Legislative Analyst’s Office analysis of CDCR’s proposed budget for FY 2025-26, and its recommendation acknowledging this court may have some role to play before beds are deactivated: Inpatient Mental Health Beds.

The Governor proposes \$3 million General Fund in 2025-26 (growing to \$4.4 million in 2026-27 and ongoing) to activate a newly constructed licensed 50-bed mental health crisis facility. With the addition of this capacity, the budget reflects operation of 686 inpatient beds in excess of the amount projected to be necessary.

We recommend approving the activation to address regional bed needs, but directing CDCR to seek approval from the Coleman federal court to align statewide inpatient bed capacity with updated population projections and to account for transportation savings. These changes could save more than \$100 million annually if all the excess beds are deactivated. See Legislative Analyst’s Office, The 2025-26 Budget: California Department of Corrections and Rehabilitation ([https://lao.ca.gov/Publications/Report/4986#Inpatient_Mental_Health_Beds_\(last checked 08/21/2025\)](https://lao.ca.gov/Publications/Report/4986#Inpatient_Mental_Health_Beds_(last_checked_08/21/2025))) (emphasis added); Fed.

R. Evid. 201. 1 necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and 2 principles of law.”). The record before the court demonstrates defendants’ plans raise substantial 3 questions that this court cannot answer within the time defendants say they will proceed unless 4 restrained with deactivating inpatient beds and MHCBS.

Even though the court has not 5 previously granted plaintiffs’ request to file their proposed motion, defendants have taken the 6 opportunity to present their position on the substance of the proposed motion in their original and 7 two amended oppositions to the request, as well as in their response to the August 20, 2025 8 minute order.

The court has carefully reviewed the parties’ filings and notes the parties have not 9 identified and the court is not aware of any irreparable harms or serious inequities that are likely 10 to arise if beds are not deactivated on the timeline defendants currently plan.

To the contrary, 11 economy of time and effort for everyone involved—the court, a possible Receiver, the parties, 12 and counsel—are best served by the court’s exercise of its inherent authority to maintain the 13 status quo for a period of fourteen days while it considers the totality of the record now before the 14 court on this important issue 15 Accordingly, good cause appearing, IT IS HEREBY ORDERED that defendants shall 16 maintain the current active licensure of all inpatient and mental health crisis beds and not proceed 17 with their planned deactivation of those beds for a period of fourteen days or until further order of 18 the court.

19 DATED: August 21, 2025.

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