

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PRECEDENTIAL VALUE	nonprecedential district court order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)

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