

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Jonathan C. Coffer v. Judge Kliszewski, et al.

Coffer · No. 25-cv-01464-EKL · Decided December 31, 2025

SUMMARY

The United States District Court for the Northern District of California screened Jonathan Coffer's second amended 42 U.S.C. § 1983 complaint concerning his 2007 commitment to the California Youth Authority. The court held that the defendant judge was entitled to absolute judicial immunity and the defendant prosecutor was entitled to absolute prosecutorial immunity. The court denied leave to amend and dismissed the action with prejudice for failure to state a claim.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Eumi K. Lee
JURISDICTION	United States District Court for the Northern District of California
DECIDED	December 31, 2025
DOCKET	25-cv-01464-EKL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a prisoner's second amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must identify cognizable claims and dismiss claims that are frivolous or malicious, fail to state a claim, or seek monetary relief from an immune defendant. The court also applied the Rule 8(a)(2) and plausibility standards from Twombly and Iqbal, construing the pro se pleading liberally.
PRECEDENTIAL VALUE	unknown

TOPICS

- section 1983
- prisoners rights
- civil procedure
- damages

PRACTICE AREAS

- civil rights
- prisoner civil rights
- federal civil procedure

QUESTIONS PRESENTED

1. Whether the claims for damages against Judge Kliszewski were barred by absolute judicial immunity.
2. Whether the claims for damages against Assistant District Attorney Migas were barred by absolute prosecutorial immunity.
3. Whether Coffey should receive further leave to amend after the court previously granted leave to amend.

HOLDINGS

1. A state judge is absolutely immune from liability for damages under 42 U.S.C. § 1983 for acts performed in a judicial capacity, and sentencing Coffey during juvenile proceedings was a judicial act. The claims against Judge Kliszewski therefore failed to state a claim and were dismissed without leave to amend.
2. A prosecutor is absolutely immune from liability for conduct undertaken as an advocate for the State and intimately associated with the judicial phase of a criminal or juvenile delinquency proceeding. Advocating for a specific disposition in juvenile proceedings falls within that protected function, so the claims against Migas were dismissed without leave to amend.
3. The action was dismissed with prejudice for failure to state a claim, and further leave to amend was denied because the defects caused by judicial and prosecutorial immunity could not be cured by amendment.

KEY QUOTATIONS

“A state judge has absolute immunity from civil liability for damages for acts performed in his judicial capacity.” (Section III.A)

“Advocating for a specific disposition during juvenile criminal proceedings, however, is undoubtedly ‘intimately associated with the judicial phase of the [juvenile delinquency] process.’” (Section III.B)

FACTUAL BACKGROUND

Coffey alleged that in 2007 Judge Kliszewski sentenced him to eight years in the California Youth Authority. He alleged that Assistant District Attorney Maryann Migas deliberately sent him to the California Youth Authority knowing the commitment was illegal. Coffey claimed that learning of the allegedly illegal commitment caused him to stop eating and cut his wrists, and he sought monetary damages from both defendants.

PROCEDURAL HISTORY

Jonathan C. Coffey, proceeding pro se and as a prisoner, filed a civil-rights action challenging his 2007 commitment to the California Youth Authority and seeking damages from Judge Kliszewski and Assistant District Attorney Migas. The court previously dismissed the complaint with leave to amend; Coffey filed amended complaints and a letter requesting further leave to amend. The court screened the second amended complaint, denied further leave to amend, dismissed the action with prejudice, and directed the Clerk to enter judgment and close the file.

DISPOSITION

dismissed

CASES CITED

- *Balistreri v. Pacifica Police Dep't*, 901 F.2d 696, 699 (9th Cir.)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 679 (2009)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Lemire v. Cal. Dep't of Corrections & Rehabilitation*, 726 F.3d 1062, 1074 (9th Cir.)
- *Leer v. Murphy*, 844 F.2d 628, 633-34 (9th Cir.)
- *Pierson v. Ray*, 386 U.S. 547, 553-55 (1967)
- *Mitchell v. Forsyth*, 472 U.S. 511, 526 (1985)
- *Stump v. Sparkman*, 435 U.S. 349, 362 (1978)
- *Simmons v. Sacramento Cnty. Super. Ct.*, 318 F.3d 1156, 1161 (9th Cir.)
- *Butz v. Economou*, 438 U.S. 478, 511 (1978)
- *Burton v. Infinity Cap. Mgmt.*, 862 F.3d 740, 747 (9th Cir.)
- *In re C.H.*, 53 Cal. 4th 94 (2011)
- *Wheeler v. City of Santa Clara*, 894 F.3d 1046, 1059 (9th Cir.)
- *Imbler v. Patchman*, 424 U.S. 409, 430-31 (1976)
- *Cousins v. Lockyer*, 568 F.3d 1063, 1068-69 (9th Cir.)
- *Jackson v. Barnes*, 749 F.3d 755, 766 (9th Cir.)
- *Gilliam v. Napa Cnty.*, 73 Fed. Appx. 206 (9th Cir.)
- *Miller v. Gammie*, 335 F.3d 889, 898 (9th Cir.)