

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Shale Well v. County of Alameda

Well · No. 25-cv-01894-LJC · Decided April 28, 2025

SUMMARY

The United States District Court for the Northern District of California denied the County of Alameda’s motion under Federal Rule of Civil Procedure 12(f) to strike the plaintiff’s requests for attorneys’ fees and injunctive relief. The court held that Rule 12(f) is not an appropriate vehicle to challenge a request for a particular form of relief and alternatively concluded that the issues were better addressed at a later stage. The order did not decide the County’s separate Rule 12(b)(6) motion to dismiss.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Merry A. J. Cisneros
JURISDICTION	United States District Court for the Northern District of California
DECIDED	April 28, 2025
DOCKET	25-cv-01894-LJC
DISPOSITION	other
PROCEDURAL POSTURE	The County of Alameda moved under Federal Rule of Civil Procedure 12(f) to strike the plaintiff's requests for attorney fees and injunctive relief, and separately moved under Rule 12(b)(6) to dismiss the First Amended Complaint. This order decided only the Rule 12(f) arguments and did not resolve the motion to dismiss.
STANDARD OF REVIEW	A Rule 12(f) motion to strike is committed to the district court's sound discretion, but motions to strike are generally disfavored and are appropriate only in limited circumstances.
PRECEDENTIAL VALUE	Unknown; district court order with no reported citation
PARTIES	County of Alameda v. Shale Well

TOPICS

- civil procedure
- pleadings
- motions to dismiss
- attorney fees
- injunctions

PRACTICE AREAS

civil procedure

remedies

federal litigation

QUESTIONS PRESENTED

1. Whether Rule 12(f) authorizes the court to strike Well's requests for attorney fees and injunctive relief from the complaint.
2. Whether the County established grounds, in the court's discretion, to strike those requests at the early pleading stage.

HOLDINGS

1. Rule 12(f) is not an appropriate vehicle to strike a request for a particular form of relief, including requests for attorney fees or injunctive relief, and does not authorize dismissal of a damages claim merely because the requested relief is legally unavailable.
2. Even if the requests were not legally improper under Rule 12(f), the court would deny the motion in its discretion because the attorney-fee issue could change if Well later retained counsel and the injunctive-relief issues required factual development.

KEY QUOTATIONS

“The function of a 12(f) motion to strike is to avoid the expenditure of time and money that must arise from litigating spurious issues by dispensing with those issues prior to trial” (at 1)

“To be clear, the Court does not hold that Well can or will recover any attorneys’ fees or obtain any injunctive relief.” (at 2)

FACTUAL BACKGROUND

Shale Well, proceeding without counsel, filed a First Amended Complaint against Alameda County and requested attorney fees and injunctive relief. The County argued that the attorney-fee request should be stricken because Well was not represented by counsel and that the request for injunctive relief should be stricken based on the alleged inadequacy of legal remedies and related equitable considerations. The court concluded that these issues were premature and should not be resolved through a Rule 12(f) motion at the beginning of the case and without a factual record.

PROCEDURAL HISTORY

The County filed its motion challenging the plaintiff's First Amended Complaint. The district court summarily denied the requests to strike attorney fees and injunctive relief, while leaving the Rule 12(b)(6) dismissal arguments for further briefing and later decision.

DISPOSITION

other

CASES CITED

- Whittlestone, Inc. v. Handi-Craft Co., 618 F.3d 970, 973 (9th Cir. 2010)
- Whittlestone, Inc. v. Handi-Craft Co., 618 F.3d 970, 976 (9th Cir. 2010)
- Nguyen v. CTS Elecs. Mfg. Sols. Inc., No. 13-CV-03679-LHK, 2014 WL 46553, at *3 (N.D. Cal. Jan. 6, 2014)
- Pollock v. Fed. Ins. Co., No. 21-cv-09975-JCS, 2022 WL 912893, at *5 (N.D. Cal. Mar. 29, 2022)

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