

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sykes v. Galindo, et al.

Sykes · No. 1:23-cv-01770-KES-EPG (PC) · Decided September 15, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations and denied state prisoner Troy Sykes’s request for injunctive relief concerning an allegedly retaliatory prison transfer. The court held that the requested relief lacked a sufficient nexus to the retaliation claim pending in the action and that the request was inadequately substantiated.

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	September 15, 2025
DOCKET	1:23-cv-01770-KES-EPG (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought injunctive relief to prevent or address an allegedly retaliatory prison transfer. The district court reviewed de novo the magistrate judge's findings and recommendations, to which no objections were filed.
STANDARD OF REVIEW	De novo review under 28 U.S.C. § 636(b)(1) of the magistrate judge's findings and recommendations. Preliminary injunctive relief requires satisfaction of the Winter factors.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown
PARTIES	Troy Sykes v. Omar Galindo, Oscar Hernandez, Preston Martin, Vanessa Hernandez, et al.

TOPICS

- injunctions
- prisoners rights
- section 1983
- civil rights
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether plaintiff was entitled to preliminary injunctive relief concerning his prison transfer.
2. Whether the requested injunction had a sufficient nexus to the claims and conduct alleged in the underlying § 1983 complaint.

HOLDINGS

1. Plaintiff's request for injunctive relief was properly denied because he did not establish the requirements for extraordinary preliminary relief, including a likelihood of success on a claim connected to the challenged transfer.
2. A district court lacks authority to grant injunctive relief absent a sufficient nexus between the injury claimed in the motion and the conduct asserted in the underlying complaint.
3. Prisoners generally have no constitutionally protected liberty interest in being held at or remaining at a particular prison facility, although a transfer may not be imposed in retaliation for exercising First Amendment rights.

KEY QUOTATIONS

“there must be a relationship between the injury claimed in the motion for injunctive relief and the conduct asserted in the underlying complaint. This requires a sufficient nexus between the claims raised in a motion for injunctive relief and the claims set forth in the underlying complaint itself.” (at 2)

“The relationship between the preliminary injunction and the underlying complaint is sufficiently strong where the preliminary injunction would grant “relief of the same character as that which may be granted finally.”” (at 2)

“The injunctive relief plaintiff seeks “is an extraordinary remedy never awarded as of right.”” (at 2)

FACTUAL BACKGROUND

Sykes alleged that a prison transfer described as being based on staff familiarity was retaliatory. His operative retaliation claim concerned specific actions by defendants after he filed grievances, not the later transfer addressed in his motion. He did not connect the transfer or its stated rationale to any defendant, and the transfer occurred during the litigation after the motion for injunctive relief was filed.

PROCEDURAL HISTORY

Sykes, a state prisoner proceeding pro se and in forma pauperis, filed this action under 42 U.S.C. § 1983. He moved for injunctive relief in connection with an upcoming prison transfer, asserting that the transfer was retaliatory. The magistrate judge recommended denial because the requested relief was not connected to a pending retaliation claim and plaintiff did not allege that the defendants were responsible for the transfer. The district court conducted de novo review, adopted the findings and recommendations, denied injunctive relief, and referred the matter back to the magistrate judge for further proceedings.

DISPOSITION

other

REMAND INSTRUCTIONS

The findings and recommendations were adopted, the request for injunctive relief was denied, and the matter was referred back to the magistrate judge for further proceedings.

CASES CITED

- Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 20, 24 (2008)
- Munaf v. Geren, 553 U.S. 674, 689-90 (2008)
- Amoco Prod. Co. v. Vill. of Gambell, AK, 480 U.S. 531, 542 (1987)
- Weinberger v. Romero-Barcelo, 456 U.S. 305, 311-12 (1982)
- Price v. Breitenbach, No. 3:24-CV-00118-CSD, 2025 WL 1517909, at *2-*3 (D. Nev. May 28, 2025)
- All. for the Wild Rockies v. Cottrell, 632 F.3d 1127, 1132 (9th Cir. 2011)
- Pac. Radiation Oncology, LLC v. Queen's Med. Ctr., 810 F.3d 631, 636 (9th Cir. 2016)
- De Beers Consol. Mines v. United States, 325 U.S. 212, 220 (1945)
- Pratt v. Rowland, 65 F.3d 802, 806 (9th Cir. 1995)
- Rizzo v. Dawson, 778 F.2d 527, 531 (9th Cir. 1985)
- Gomez v. Vernon, 255 F.3d 1118, 1127-28 (9th Cir. 2001)