

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Williams v. California Highway Patrol

No. 2:25-cv-787 DAD-SCR (E.D. Cal. Apr. 22, 2025) · No. 2:25-cv-787 DAD-SCR · Decided April 24, 2025

SUMMARY

The document is an order vacating prior findings and recommendations and recommending denial of a pro se plaintiff’s motion for a temporary restraining order. The plaintiff challenged the traffic stop and impoundment of his unregistered vehicle by the California Highway Patrol, asserting Fourth Amendment, procedural due process, and constitutional right-to-travel claims. The court found that plaintiff had not shown serious questions on the merits or irreparable harm.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 24, 2025
DOCKET	2:25-cv-787 DAD-SCR
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff, proceeding pro se, moved for a temporary restraining order requiring the immediate return of his impounded vehicle and other relief. After vacating an earlier recommendation, the magistrate judge issued amended findings and recommendations recommending denial of the TRO.
STANDARD OF REVIEW	A TRO requires the movant to establish likelihood of success on the merits, likely irreparable harm, a favorable balance of equities, and that an injunction is in the public interest, or alternatively serious questions going to the merits, irreparable harm, and a strong balance of equities in the movant's favor.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Arik Williams v. California Highway Patrol, Officer Brett Wade, other defendants

TOPICS

injunctions

procedural due process

civil rights

section 1983

civil procedure

PRACTICE AREAS

civil rights

constitutional law

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether Williams showed serious questions going to the merits of his Fourth Amendment claim that the impoundment of his unregistered vehicle was an unreasonable warrantless seizure.
2. Whether Williams showed serious questions going to the merits of his procedural due process claim based on the handling of the administrative hearing concerning the impounded vehicle.
3. Whether vehicle impoundment and state registration requirements violated Williams's constitutional right to travel.
4. Whether Williams demonstrated likely irreparable harm warranting a temporary restraining order.

HOLDINGS

1. Williams failed to show serious questions going to the merits of his Fourth Amendment claim because he did not demonstrate that he could move the unregistered vehicle without continuing to violate state registration laws or that an alternative means of removing it was available.
2. Williams failed to show serious questions going to the merits of his procedural due process claim on the current record.
3. Williams failed to show serious questions going to the merits of his right-to-travel claim because burdens on a single mode of transportation do not implicate the fundamental right to interstate travel, and there is no fundamental right to drive.
4. Williams failed to demonstrate irreparable harm because his alleged financial injury was ordinarily compensable by damages, he did not intend to operate the vehicle unless he prevailed on his legal theory, and the vehicle had reportedly been released to a third party.

KEY QUOTATIONS

“A warrantless traffic stop is permissible under the Fourth Amendment “where the police have probable cause to believe a traffic violation has occurred.”” (Analysis § IV.A)

“However, the subsequent impoundment of Plaintiff’s vehicle was a presumptively unreasonable warrantless seizure that would be justified only if the “community caretaking” exception applies.” (Analysis § IV.A)

“Plaintiff does not have a fundamental ‘right to drive.’” (Analysis § IV.A)

“Monetary injury is not normally considered irreparable.” (Analysis § IV.B)

FACTUAL BACKGROUND

California Highway Patrol Officer Brett Wade stopped Williams while he was driving a Ford truck that lacked valid California registration and impounded the truck under California Vehicle Code section 22651(o)(3)(A). Williams had previously been cited for driving the same vehicle without valid registration and did not register it after paying the earlier fine. CHP mailed Williams a notice concerning his right to an administrative hearing under Vehicle Code section 22852, but when he called, he was told that he could recover the vehicle by registering it or otherwise would need to file a lawsuit. Williams maintained that registration requirements could not constitutionally prevent him from traveling in his privately owned vehicle; the vehicle was later reportedly released to Wells Fargo Auto, its lender and legal owner.

PROCEDURAL HISTORY

Williams filed a complaint and TRO motion on March 10, 2025, alleging that a California Highway Patrol officer unlawfully stopped and impounded his vehicle and that the recovery procedures violated due process. The magistrate judge initially recommended denial of the TRO, but after Williams objected and asserted additional facts, the court held a limited evidentiary hearing on April 10, 2025. The amended findings vacated the original findings and recommendations and recommended that the district judge deny the TRO.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The findings and recommendations are to be submitted to the assigned district judge under 28 U.S.C. § 636(b) (1). The parties may file objections within fourteen days. The magistrate judge recommended that the TRO motion be denied; the document itself did not enter a final district-court disposition.

CASES CITED

- *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015)
- *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1134-35 (9th Cir. 2011)
- *Whren v. United States*, 517 U.S. 806, 810 (1996)
- *Sandoval v. County of Sonoma*, 912 F.3d 509, 516 (9th Cir. 2019)
- *Miranda v. City of Cornelius*, 429 F.3d 858, 865 (9th Cir. 2005)
- *Leslie v. City of Sand City*, 615 F. Supp. 2d 1121, 1125-26 (N.D. Cal. 2009)
- *Constitution of U.S. v. Southwick*, 2008 WL 5111144, at *2-3 (D. Or. Dec. 1, 2008)
- *United States v. Cartwright*, 630 F.3d 610, 616 (7th Cir. 2010)
- *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976)
- *Orloff v. Cleland*, 708 F.2d 372, 378-79 (9th Cir. 1983)
- *Papachristou v. City of Jacksonville*, 405 U.S. 156, 165 (1972)
- *Miller v. Reed*, 176 F.3d 1202, 1205-06 (9th Cir. 1999)
- *Cholerton v. Brown*, 2014 WL 3818049, at *4 (C.D. Cal. May 16, 2014)
- *McCain v. Stockton Police Department*, 2011 WL 4710696, at *5 (E.D. Cal. Oct. 4, 2011)

- hiQ Labs, Inc. v. LinkedIn Corp., 31 F.4th 1180, 1188 (9th Cir. 2022)
- Los Angeles Memorial Coliseum Commission v. National Football League, 634 F.2d 1197, 1202 (9th Cir. 1980)
- Sampson v. Murray, 415 U.S. 61, 90 (1974)
- Rent-A-Center, Inc. v. Canyon Television & Appliance Rental, Inc., 944 F.2d 597, 603 (9th Cir. 1991)
- Goldie's Bookstore, Inc. v. Superior Court, 739 F.2d 466, 471 (9th Cir. 1984)
- Brewster v. City of Los Angeles, 672 F. Supp. 3d 872 (C.D. Cal. 2023)
- Martinez v. Yist, 951 F.2d 1153 (9th Cir. 1991)

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