

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Alonzo Warren, Jr. v. Deputy D. Rios, et al.

Warren v. Rios · No. 2:25-cv-2242 CSK P · Decided September 30, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Alonzo Warren, Jr. leave to proceed in forma pauperis but assesses the statutory filing fee. The court finds potentially cognizable excessive-force claims against several defendants and a failure-to-protect claim against another defendant, while dismissing the clothing and flooding claims as inadequately pleaded and misjoined. The complaint is dismissed with leave to amend within thirty days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 30, 2025
DOCKET	2:25-cv-2242 CSK P
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983; the court screened the complaint under 28 U.S.C. § 1915A, granted leave to proceed in forma pauperis, dismissed the complaint, and granted leave to amend.
STANDARD OF REVIEW	The court screened the prisoner complaint under 28 U.S.C. § 1915A and applied the Rule 8(a)(2) failure-to-state-a-claim standard, accepting well-pleaded allegations as true and construing the complaint in the plaintiff's favor.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Alonzo Warren, Jr. v. Deputy D. Rios, J. Perez, Ruiz #624, A. Gutierrez, H. Delgadillo, MC, et al.

TOPICS

- section 1983
- prisoners rights
- civil rights
- fourteenth amendment
- pleadings

PRACTICE AREAS

prisoner civil rights

constitutional law

civil procedure

pleading and screening

in forma pauperis

QUESTIONS PRESENTED

1. Whether the complaint stated potentially cognizable Fourteenth Amendment excessive-force and failure-to-protect claims against the individually named deputies.
2. Whether the allegations concerning denial of proper clothing stated a cognizable pretrial-detainee conditions-of-confinement claim.
3. Whether the allegations concerning repeated flooding stated a cognizable pretrial-detainee conditions-of-confinement claim.
4. Whether the three sets of claims were properly joined under Federal Rules of Civil Procedure 20 and 21.
5. Whether plaintiff should be granted leave to amend after dismissal of the complaint.

HOLDINGS

1. The complaint stated potentially cognizable Fourteenth Amendment excessive-force claims against D. Rios, J. Perez, Ruiz #624, and A. Gutierrez, and plaintiff was permitted to renew those claims in an amended complaint.
2. The complaint stated a potentially cognizable Fourteenth Amendment failure-to-protect claim against H. Delgadillo.
3. The second and third claims were not cognizable as pleaded and were dismissed without prejudice.
4. The three claims were improperly joined because they arose from different incidents and involved different defendants; the unrelated claims could be dismissed without prejudice so plaintiff could pursue them in separate actions.
5. The complaint was dismissed with leave to amend within thirty days.

KEY QUOTATIONS

“Unrelated claims against unrelated defendants belong in different suits.” (at 8)

“Because plaintiff states potentially cognizable excessive force and failure to protect claims against named defendants, and his other two claims are not cognizable, plaintiff should amend his complaint to pursue the cognizable claims.” (at 9)

FACTUAL BACKGROUND

Plaintiff alleged that on June 2, 2025, several jail deputies struck him with closed fists and used a taser after he was pinned to the ground, while another deputy observed and failed to intervene. He alleged injuries including nerve damage, chest and back pain, jaw impairment, head swelling, and a shoulder laceration. He also alleged that he was denied proper clothing for approximately sixty-seven days and that his cell was repeatedly flooded with contaminated water for more than thirty days, but he did not identify specific responsible defendants or allege physical injury from those conditions.

PROCEDURAL HISTORY

Plaintiff, a county jail inmate proceeding pro se, filed a § 1983 complaint alleging excessive force, inadequate clothing, and unconstitutional flooding conditions. The court granted in forma pauperis status, assessed the statutory filing fee and initial partial fee, found the excessive-force and failure-to-protect allegations potentially cognizable, found the clothing and flooding claims noncognizable as pleaded, and dismissed the complaint with thirty days to amend.

DISPOSITION

dismissed

CASES CITED

- Stone v. City of San Francisco, 968 F.2d 850, 857 n.10 (9th Cir. 1992)
- Trueblood v. Wash. State Dep't of Soc. & Health Servs., 822 F.3d 1037, 1043 (9th Cir. 2016)
- Mendiola-Martinez v. Arpaio, 836 F.3d 1239, 1246 n.5 (9th Cir. 2016)
- Byrd v. Maricopa Cnty. Bd. of Supervisors, 845 F.3d 919, 924 n.2 (9th Cir. 2017)
- Neitzke v. Williams, 490 U.S. 319, 325, 327 (1989)
- Franklin v. Murphy, 745 F.2d 1221, 1227-28 (9th Cir. 1984)
- Jackson v. Arizona, 885 F.2d 639, 640 (9th Cir. 1989)
- Lopez v. Smith, 203 F.3d 1122, 1130-31 (9th Cir. 2000)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Erickson v. Pardus, 551 U.S. 89, 93 (2007)
- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Bell v. Wolfish, 441 U.S. 520, 535, 539, 539 n.21 (1979)
- Kingsley v. Hendrickson, 576 U.S. 389, 396-97 (2015)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1069, 1071 (9th Cir. 2016)
- Alvarez-Machain v. United States, 107 F.3d 696, 701 (9th Cir. 1996)
- Hoptowit v. Ray, 682 F.2d 1237, 1246 (9th Cir. 1982)
- Gordon v. County of Orange, 888 F.3d 1118, 1120, 1122-25 (9th Cir. 2018)
- Daniels v. Williams, 474 U.S. 327, 330-31 (1986)
- Clouthier v. County of Contra Costa, 591 F.3d 1232, 1242-43 (9th Cir. 2010)
- Darnell v. Pineiro, 849 F.3d 17, 36 (2d Cir. 2017)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Rush v. Sport Chalet, Inc., 779 F.3d 973, 975 (9th Cir. 2015)
- DirecTV, Inc. v. Leto, 467 F.3d 842, 846-47 (3d Cir. 2006)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Rizzo v. Goode, 423 U.S. 362, 371 (1976)

- May v. Enomoto, 633 F.2d 164, 167 (9th Cir. 1980)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Ramirez v. County of San Bernardino, 806 F.3d 1002, 1008 (9th Cir. 2015)

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