

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sinclair v. Schmit

No. 2:25-cv-0903 CSK P · No. No. 2:25-cv-0903 CSK P · Decided May 8, 2025

SUMMARY

The United States District Court for the Eastern District of California grants the plaintiff an additional thirty days to submit an in forma pauperis application and certified inmate trust account statement. The magistrate judge recommends denying the plaintiff’s motion for preliminary injunctive relief without prejudice because defendants had not been served, the motion did not satisfy the Winter factors, lacked a clear nexus to the complaint, and was not narrowly drawn under the Prison Litigation Reform Act. The findings and recommendations were issued subject to objections within fourteen 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	May 8, 2025
DOCKET	No. 2:25-cv-0903 CSK P
DISPOSITION	other
PROCEDURAL POSTURE	A county jail inmate proceeding pro se brought a civil-rights action under 42 U.S.C. § 1983 and moved for preliminary injunctive relief before the complaint had been screened or any defendant had been served. The magistrate judge ordered an extension of time for plaintiff to submit his in forma pauperis materials and issued findings and recommendations that the motion for injunctive relief be denied without prejudice.
STANDARD OF REVIEW	Preliminary injunctive relief requires the movant to establish a likelihood of success on the merits, a likelihood of irreparable harm absent relief, that the balance of equities favors relief, and that an injunction is in the public interest. The court also considered personal jurisdiction, the required nexus between the requested injunction and the claims pleaded, and the Prison Litigation Reform Act’s narrow-tailoring and least-intrusive-means requirements.

PRECEDENTIAL VALUE	Unknown; magistrate judge findings and recommendations in an unpublished district-court matter
PARTIES	Alexander Sinclair v. Dylan Schmit, Judge Shauna Franklin, Judge Tami R. Bogert, Carol McBane, Andrew S. Crouse, Judge Kevin J. McCormick, Caity Maple, Jason Davis, Paul J. Bailey, Jefferson Gormon, Krishna Shorna, Gavin Newsom

TOPICS

injunctions

prisoners rights

section 1983

personal jurisdiction

civil procedure

PRACTICE AREAS

Prisoner civil rights

Federal civil procedure

Preliminary injunctive relief

Personal jurisdiction

QUESTIONS PRESENTED

1. Whether the court could grant preliminary injunctive relief against defendants who had not been served and over whom the court lacked personal jurisdiction.
2. Whether plaintiff established the Winter factors required for a preliminary injunction.
3. Whether the requested relief was sufficiently connected to the claims pleaded in the complaint.
4. Whether the requested relief satisfied the Prison Litigation Reform Act's requirements that prisoner injunctive relief be narrowly drawn, no broader than necessary, and the least intrusive means of correcting the alleged harm.

HOLDINGS

1. A federal district court may not grant the requested preliminary injunctive relief against defendants who have not been served with process because the court lacks personal jurisdiction over them.
2. Plaintiff was not entitled to preliminary injunctive relief because he did not address or establish the required Winter elements, including likely success on the merits, irreparable harm, favorable equities, and the public interest.
3. The court lacked authority to grant injunctive relief unrelated to the claims pleaded in the complaint.
4. The requested relief did not satisfy the Prison Litigation Reform Act because it was not narrowly drawn, did not extend no further than necessary to correct the alleged harm, and was not shown to be the least intrusive means of doing so.

KEY QUOTATIONS

“A preliminary injunction is an extraordinary remedy never awarded as of right.” (at 4)

“When a plaintiff seeks injunctive relief based on claims not pled in the complaint, the court does not have the authority to issue an injunction.” (at 5)

“Until defendants have been served with process, this Court lacks personal jurisdiction over them, and may not grant the injunctive relief he seeks.” (at 6)

“Preliminary injunctive relief must be narrowly drawn, extend no further than necessary to correct the harm the court finds requires preliminary relief, and be the least intrusive means necessary to correct that harm.” (at 6)

FACTUAL BACKGROUND

Plaintiff is a county jail inmate who alleges that officials and other defendants subjected him to retaliation, forced injections and blood draws, excessive force, inadequate medical care, unsanitary conditions, false disciplinary or mental-health records, and other misconduct. His motion for preliminary injunction sought broad and unclear relief, including investigations and information concerning other inmates and events in multiple counties. The complaint had not been screened, no defendant had been served, and plaintiff had not clearly connected the requested injunction to a specific claim in the complaint.

PROCEDURAL HISTORY

Plaintiff filed this § 1983 action and failed to submit the completed in forma pauperis application and certified six-month inmate trust-account statement required by a March 31, 2025 order. He filed a motion for preliminary injunction on May 5, 2025, alleging numerous largely incomprehensible incidents involving retaliation, forced medication, confinement, medical care, and other misconduct. Because the complaint had not yet been screened and defendants had not been served, the magistrate judge recommended denial of the motion without prejudice and granted plaintiff thirty additional days to submit the required filing-fee materials.

DISPOSITION

other

CASES CITED

- *Bennett v. Medtronic, Inc.*, 285 F.3d 801, 803 n.2 (9th Cir. 2002)
- *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20, 23-24 (2008)
- *City of Los Angeles v. Lyons*, 461 U.S. 95, 111 (1983)
- *Caribbean Marine Service Co. v. Baldridge*, 844 F.2d 668, 674 (9th Cir. 1988)
- *Zenith Radio Corp. v. Hazeltine Research, Inc.*, 395 U.S. 100, 130-31 (1969)
- *FDIC v. Garner*, 125 F.3d 1272, 1279-80 (9th Cir. 1997), cert. denied, 523 U.S. 1020 (1998)
- *Murphy Bros., Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 350 (1999)
- *Pacific Radiation Oncology, LLC v. Queen's Medical Center*, 810 F.3d 631, 633, 636 (9th Cir. 2015)
- *Beaton v. Miller*, 2020 WL 5847014, at *1 (E.D. Cal. Oct. 1, 2020)
- *Gilmore v. People of the State of California*, 220 F.3d 987, 998-99 (9th Cir. 2000)
- *Martinez v. Ylst*, 951 F.2d 1153 (9th Cir. 1991)

