

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Douglas Sharron Piggee v. U.S. Marshal for the Eastern District of
California, et al.

No. 2:25-cv-3182 SCR P, United States District Court for the Eastern District of California (December 3, 2025)

SUMMARY

The United States District Court for the Eastern District of California addresses venue, an incomplete application to proceed in forma pauperis, statutory screening of a prisoner civil-rights complaint, and a motion to amend. The court grants leave to amend, directs plaintiff to submit a completed in forma pauperis application and certified trust-account statement, and warns that failure to comply may result in a recommendation of dismissal.

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	December 3, 2025
DOCKET	2:25-cv-3182 SCR P
DISPOSITION	other
PROCEDURAL POSTURE	A federal pretrial detainee proceeding pro se filed a civil-rights complaint under 28 U.S.C. § 1331 and Bivens, together with an application to proceed in forma pauperis and a motion to amend before service.
STANDARD OF REVIEW	The court applied the screening standard under 28 U.S.C. § 1915A, requiring dismissal of frivolous claims, claims failing to state a claim, and claims seeking monetary relief from immune defendants. In assessing pleading sufficiency, the court applied the facial-plausibility standard under Twombly and Iqbal and construed allegations accepted as true in the light most favorable to plaintiff.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Douglas Sharron Piggee v. U.S. Marshal for the Eastern District of California, et al.

TOPICS

motion to amend

pleadings

prisoners rights

civil rights

civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

federal courts

QUESTIONS PRESENTED

1. Whether the action should be transferred to the Fresno Division because the alleged violations occurred there.
2. Whether consideration of plaintiff's incomplete application to proceed in forma pauperis should be deferred pending submission of the required certification and inmate trust-account statement.
3. Whether plaintiff could amend his complaint as a matter of course before service of the original complaint.
4. What screening and completeness requirements would govern any amended prisoner civil-rights complaint.

HOLDINGS

1. Transfer to the Fresno Division was unnecessary because the named defendants resided in Sacramento County, notwithstanding that the alleged violations occurred in Fresno County.
2. Consideration of the in forma pauperis application was properly deferred because the application lacked the institutional certificate and a certified inmate trust-account statement for the preceding six months.
3. Plaintiff could amend his complaint once as a matter of course because the original complaint had not yet been served.
4. The complaint was subject to screening under 28 U.S.C. § 1915A, which requires dismissal of frivolous or malicious claims, claims failing to state a claim, and claims seeking monetary relief from immune defendants.

KEY QUOTATIONS

“Local Rule 220 requires that an amended complaint be complete in itself without reference to any prior pleading.” (at 3)

“Since the original complaint has not yet been served, the court will grant plaintiff's motion to amend.” (at 3)

FACTUAL BACKGROUND

Plaintiff, a federal pretrial detainee, alleged civil-rights violations by defendants employed by the United States Marshal Service in Sacramento. Although the alleged violations occurred in Fresno County, the named defendants resided in Sacramento County. Plaintiff filed an incomplete in forma pauperis application and sought to amend his complaint to add defendants before the original complaint had been served.

PROCEDURAL HISTORY

Plaintiff filed a civil-rights complaint alleging violations by employees of the United States Marshal Service, an incomplete application to proceed in forma pauperis, and a motion to amend the complaint. The court declined to transfer the action to the Fresno Division, deferred consideration of the in forma pauperis application pending completion of the required materials, granted leave to amend as a matter of course, and directed plaintiff to file a complete amended complaint within thirty days.

DISPOSITION

other

CASES CITED

- *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971)
- *Neitzke v. Williams*, 490 U.S. 319 (1989)
- *Jackson v. Arizona*, 885 F.2d 639 (9th Cir. 1989)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)
- *Erickson v. Pardus*, 551 U.S. 89 (2007)
- *Scheuer v. Rhodes*, 416 U.S. 232 (1974)
- *Monell v. Department of Social Services*, 436 U.S. 658 (1978)
- *Rizzo v. Goode*, 423 U.S. 362 (1976)
- *Starr v. Baca*, 652 F.3d 1202 (9th Cir. 2011)