

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

John W. Williams v. Beer, et al.

John W. Williams v. Beer, No. 1:21-cv-00155-KES-EPG (PC) (E.D. Cal. Oct. 30, 2025) · No. 1:21-cv-00155-KES-EPG (PC) · Decided October 31, 2025

SUMMARY

The Eastern District of California denied without prejudice defendants’ motion to enforce a subpoena seeking records from Dr. Brandi Mathews. The court held that under Federal Rule of Civil Procedure 45, any motion to compel compliance must be brought in the district where compliance is required; because the subpoena designated an address in Los Angeles, the Central District of California was the proper venue.

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	October 31, 2025
DOCKET	1:21-cv-00155-KES-EPG (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved to enforce a subpoena seeking records from nonparty Dr. Brandi Mathews.
PRECEDENTIAL VALUE	Unknown

TOPICS

- discovery dispute
- civil procedure
- subject matter jurisdiction

PRACTICE AREAS

- civil procedure
- federal civil procedure
- subpoenas

QUESTIONS PRESENTED

- Whether the Eastern District of California had authority under Federal Rule of Civil Procedure 45 to enforce a subpoena requiring document production in Los Angeles, California.
- Whether defendants' motion to enforce should be denied without prejudice because the place of compliance was outside the district.

HOLDINGS

1. Under Federal Rule of Civil Procedure 45(d)(2)(B)(i), a motion to compel production under a subpoena must be brought in the district where compliance is required.
2. A motion to enforce a subpoena must be denied without prejudice when the subpoena requires compliance outside the issuing court's district.

KEY QUOTATIONS

“Because the place of compliance is not in this District, Defendants’ motion (ECF No. 115) is DENIED without prejudice.” (at 1)

“Rule 45 consistently, through numerous sections of the Rule, requires any motions or applications related to a subpoena be brought in the district where compliance is required” (at 1)

FACTUAL BACKGROUND

Defendants sought records from Dr. Brandi Mathews, who had been retained by plaintiff to prepare an expert report used in support of a mental-health-diversion plea in a related criminal case. The subpoena required production at Ace Imaging Technologies, Inc., in Los Angeles, California. Because Los Angeles is in the Central District of California rather than the Eastern District, the court concluded that the motion was brought in the wrong district.

PROCEDURAL HISTORY

In this federal prisoner civil-rights action, defendants moved to enforce a subpoena for records from Dr. Mathews. The Eastern District of California denied the motion without prejudice because the subpoena required compliance at an address in Los Angeles, which lies in the Central District of California.

DISPOSITION

other

CASES CITED

- Pizana v. Basic Rsch., LLC, 2022 WL 1693317, at *2–3 (E.D. Cal. May 26, 2022)