

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Wilson v. Merritt

Wilson v. Merritt · No. 1:22-cv-0455 JLT CDB (PC) · Decided March 6, 2025

SUMMARY

The court adopted the magistrate judge’s findings and recommendations and denied Plaintiff David Wayne Wilson’s motion to join additional prison officials as defendants and for a preliminary injunction. The court held that permissive joinder was unavailable because the proposed claims did not arise from the same transaction or occurrence as the existing claims, and that the requirements for injunctive relief were not met.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jennifer L. Thurston
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 6, 2025
DOCKET	1:22-cv-0455 JLT CDB (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's findings and recommendations recommending denial of his motion to join additional defendants and for a preliminary injunction. The district court adopted the findings and recommendations and denied the motion.
STANDARD OF REVIEW	The district court reviewed the magistrate judge's findings and recommendations and determined that they were supported by the record and proper analysis.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	David Wayne Wilson v. Lura Merritt, Fishburn, Carlson, Alvarez, Tienken, Guzman, Morales

TOPICS

- joinder
- injunctions
- prisoners rights
- section 1983
- civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

equitable remedies

QUESTIONS PRESENTED

1. Whether permissive joinder of the proposed defendants was proper under Federal Rule of Civil Procedure 20(a)(2).
2. Whether Wilson was entitled to a preliminary injunction requiring single-cell housing and transfer to another facility.

HOLDINGS

1. Permissive joinder was improper because the proposed claims concerning later denials of single-cell housing did not arise out of the same transaction, occurrence, or series of events as the existing claims, and no common question of law or fact connected all defendants.
2. Wilson was not entitled to preliminary injunctive relief because he failed to establish the requirements for such relief, including a likelihood of success on the merits and a real and immediate threat of injury.
3. The magistrate judge's conclusion that joinder was not mandatory under Rule 19 was adopted, and Wilson did not challenge that conclusion.

KEY QUOTATIONS

“Rather, the permissive joinder of defendants is addressed in Rule 20(a)(2), which requires claims arise out of the same transaction, occurrence, or series of events for defendants to be joined; and requires a common question of law or fact to all defendants.” (at 2)

“Having carefully reviewed the matter, the Court concludes the Findings and Recommendations are supported by the record and proper analysis.” (at 3)

FACTUAL BACKGROUND

Wilson is incarcerated at the California Substance Abuse Treatment Facility and brought civil-rights claims concerning alleged denial of medical treatment, retaliation, and equal-protection violations arising from events in 2019 and 2020. He later sought to add correctional counselors Alvarez and Tienken, Captain Guzman, and Warden Morales as defendants based on denials of requests for single-cell housing. He also sought an injunction requiring single-cell housing and transfer to a different facility.

PROCEDURAL HISTORY

Wilson's action proceeded on claims concerning alleged deliberate indifference to medical needs, retaliation, and federal and state equal-protection violations arising from events in 2019 and 2020. He moved to join additional prison employees based on later denials of single-cell housing and sought an injunction requiring single-cell housing and transfer to another facility. The magistrate judge recommended denying both requests, and the district court adopted those recommendations in full after reviewing Wilson's objections.

DISPOSITION

other

CASES CITED

- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Winter v. Nat. Res. Def. Council Inc., 55 U.S. 7, 24 (2008)
- Knight v. City of Sacramento Police Dep't, 2014 WL 1883962, at *2 (E.D. Cal. May 9, 2014)

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