

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Raymond Albert Rodriguez v. State of California, et al.

Rodriguez v. State of California, No. 2:25-cv-1141 CKD P (E.D. Cal. Sept. 3, 2025) · No. No. 2:25-cv-1141
CKD P · Decided September 3, 2025

SUMMARY

The court grants Raymond Albert Rodriguez leave to proceed in forma pauperis but requires payment of the statutory filing fee. Upon screening under 28 U.S.C. § 1915A, the court identifies a Fourteenth Amendment claim against defendant Ho concerning allegedly unsanitary conditions of confinement and gives plaintiff 21 days either to proceed on that claim and dismiss the others or to file an amended complaint.

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	September 3, 2025
DOCKET	No. 2:25-cv-1141 CKD P
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983. On screening under 28 U.S.C. § 1915A, the court granted plaintiff leave to proceed in forma pauperis, found that one Fourteenth Amendment conditions-of-confinement claim against defendant Ho could proceed, and gave plaintiff the option to proceed on that claim or amend the complaint to attempt to cure deficiencies in the remaining claims.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915A; the court must dismiss prisoner claims that are frivolous or malicious, fail to state a claim, or seek monetary relief from an immune defendant.
PRECEDENTIAL VALUE	Nonprecedential district court screening order
PARTIES	Raymond Albert Rodriguez v. State of California, et al.

TOPICS

- prisoners rights
- section 1983
- ada / disability
- civil procedure
- due process

PRACTICE AREAS

prisoner civil rights

civil procedure

constitutional law

disability discrimination

QUESTIONS PRESENTED

1. Whether plaintiff satisfied the statutory requirements to proceed in forma pauperis.
2. Whether the complaint stated a potentially cognizable Fourteenth Amendment claim against defendant Ho based on deliberate indifference to unsanitary conditions of confinement.
3. Whether the State of California and Sacramento County were proper defendants for the asserted § 1983 claims.
4. Whether plaintiff stated a claim under Title II of the ADA.
5. Whether the complaint adequately linked each defendant's conduct to the alleged constitutional deprivation and adequately alleged supervisory liability.

HOLDINGS

1. Plaintiff satisfied the showing required by 28 U.S.C. § 1915(a), so the court granted leave to proceed in forma pauperis.
2. The complaint stated a claim against defendant Ho arising under the Fourteenth Amendment for Ho being at least deliberately indifferent to plaintiff's exposure to unsanitary conditions of confinement.
3. A municipality cannot be held vicariously liable under § 1983 for the actions of its employees; liability requires that execution of a government policy or custom inflict the constitutional injury.
4. Plaintiff failed to state a Title II ADA claim because he did not show exclusion from or discrimination regarding a public entity's services, programs, or activities by reason of a disability.
5. A § 1983 claim requires an affirmative link or connection between a defendant's actions and the claimed deprivation; vague and conclusory allegations of supervisory participation are insufficient, and there is no vicarious liability under § 1983.

KEY QUOTATIONS

“Instead, it is when execution of a government's policy or custom, whether made by its lawmakers or by those whose edicts or acts may fairly be said to represent official policy, inflicts the injury that the government as an entity is responsible under § 1983.” (at 2)

“To establish a violation of Title II of the ADA, a plaintiff must show that (1) [he] is a qualified individual with a disability; (2) [he] was excluded from participation in or otherwise discriminated against with regard to a public entity's services, programs, or activities; and (3) such exclusion or discrimination was by reason of [his] disability.” (at 2)

FACTUAL BACKGROUND

Plaintiff is a state prisoner who alleged exposure to unsanitary conditions of confinement in the Sacramento County Jail. He identified defendant Ho and alleged facts sufficient at the screening stage to support that Ho was

at least deliberately indifferent to the exposure. Plaintiff also named the State of California and Sacramento County, asserted an ADA claim, and alleged supervisory or official involvement in civil-rights violations.

PROCEDURAL HISTORY

Plaintiff, a state prisoner proceeding without counsel, filed a complaint seeking relief under 42 U.S.C. § 1983 and moved to proceed in forma pauperis. The court granted in forma pauperis status and screened the complaint under 28 U.S.C. § 1915A. The court identified a potentially cognizable claim against Ho concerning deliberate indifference to unsanitary conditions of confinement, while finding deficiencies in claims against other defendants and under the ADA. Plaintiff was given 21 days to elect to proceed on the identified claim and voluntarily dismiss the remaining claims or file an amended complaint.

DISPOSITION

other

CASES CITED

- Monell v. Department of Social Services, 436 U.S. 658, 691, 694 (1978)
- Lovell v. Chandler, 303 F.3d 1039, 1052 (9th Cir. 2002)
- Rizzo v. Goode, 423 U.S. 362 (1976)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)