

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ronald Eugene James v. Mattel, et al.

Ronald Eugene James v. Mattel, et al. · No. 2:24-cv-1954 DAD AC PC · Decided September 23, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends dismissing Ronald Eugene James’s copyright-infringement complaint against Mattel and other defendants without leave to amend. The court grants in forma pauperis status but concludes that the alleged use of characters depicting physical disabilities and visible differences concerns an unprotectable idea or concept under 17 U.S.C. § 102(b), rather than infringement of protected expression. The recommendation is subject to objections within 21 days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 23, 2025
DOCKET	2:24-cv-1954 DAD AC PC
DISPOSITION	other
PROCEDURAL POSTURE	A pro se state prisoner filed a copyright-infringement complaint and sought leave to proceed in forma pauperis. The magistrate judge granted in forma pauperis status and issued findings and recommendations that the complaint be dismissed without leave to amend for failure to state a claim.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court screens prisoner complaints and must dismiss claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. Failure to state a claim under § 1915A applies the familiar Rule 12(b)(6) standard, requiring sufficient factual matter to state a plausible claim for relief.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Ronald Eugene James v. Mattel, et al.

TOPICS

copyright infringement

copyright law

pleadings

civil procedure

PRACTICE AREAS

intellectual property

copyright law

civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a federal copyright-infringement claim based on defendants' alleged use of a concept involving characters with particular physical disabilities and visible differences.
2. Whether any state common-law copyright claim was cognizable or was preempted by federal copyright law.
3. Whether the complaint should be dismissed without leave to amend because its defects could not be cured by amendment.
4. Whether plaintiff should be granted leave to proceed in forma pauperis.

HOLDINGS

1. The complaint failed to state a copyright-infringement claim because plaintiff alleged appropriation of an unprotectable concept rather than infringement of a protected expression or exclusive right under the Copyright Act.
2. Any state common-law copyright claims were preempted by federal copyright law, and there is no independent state copyright law claim on the allegations presented.
3. Leave to amend should be denied because amendment would be futile given the nature of plaintiff's allegations.
4. Plaintiff satisfied the statutory showing for in forma pauperis status, but remained obligated to pay the statutory filing fee through the installment procedures applicable to prisoners.

KEY QUOTATIONS

“This type of allegation, that a concept or principle was taken from a work and used in another form, is expressly not subject to copyright protection.” (Section IV)

“These physical traits are represented in the general community and are present in many illustrations, dolls, photographs, and advertisements.” (Section IV)

FACTUAL BACKGROUND

Plaintiff alleged that he created and owned illustrated characters in a sixteen-book children's series called The Simplys, featuring characters with visible disabilities and physical differences. He alleged that Mattel created dolls depicting similar traits, including vitiligo, a peg leg, and wheelchair use, and that other defendants helped use or commercialize the alleged characters without permission. Plaintiff did not allege direct reproduction of his books, but claimed that defendants appropriated the concept of representing children with particular disabilities and visible differences.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging that Mattel and other defendants used concepts and character traits from his children's book series, The Simplys, in creating dolls depicting children with disabilities and visible differences. The action was referred to the magistrate judge under Local Rule 302 and 28 U.S.C. § 636(b)(1). The court granted plaintiff's in forma pauperis application but recommended dismissal without leave to amend; the assigned district judge retained final authority and plaintiff was given twenty-one days to object.

DISPOSITION

other

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 325, 327 (1989)
- Franklin v. Murphy, 745 F.2d 1221, 1227-28 (9th Cir. 1984)
- Jackson v. Arizona, 885 F.2d 639, 640 (9th Cir. 1989)
- Lopez v. Smith, 203 F.3d 1122, 1130-31 (9th Cir. 2000) (en banc)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Wilhelm v. Rotman, 680 F.3d 1113, 1121 (9th Cir. 2012)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Hosp. Bldg. Co. v. Trs. of the Rex Hosp., 425 U.S. 738, 740 (1976)
- Jenkins v. McKeithen, 395 U.S. 411, 421 (1969)
- Best Carpet Values, Inc. v. Google, LLC, 90 F.4th 962, 974 (9th Cir. 2024)
- A&M Recs., Inc. v. Napster, Inc., 239 F.3d 1004, 1013 (9th Cir. 2001)
- Sony Corp. of Am. v. Universal City Studios, Inc., 464 U.S. 417, 432-33 (1984)
- Cato v. United States, 70 F.3d 1103, 1105-06 (9th Cir. 1995)
- Hartmann v. Cal. Dep't of Corr. & Rehab., 707 F.3d 1114, 1130 (9th Cir. 2013)
- Noll v. Carlson, 809 F.2d 1446, 1448 (9th Cir. 1987)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)