UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Tracy S. Smith v. Santa Clara County

Smith v. Santa Clara County, No. 25-cv-02674-RFL (N.D. Cal. May 28, 2025) · No. 25-cv-02674-RFL · Decided May 28, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed without prejudice a habeas petition because the petitioner's claims concerning jail conditions and property were properly brought under 42 U.S.C. § 1983. The court granted in forma pauperis status, declined to issue a certificate of appealability, and directed the Clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Rita F. Lin
JURISDICTION	United States District Court for the Northern District of California
DECIDED	May 28, 2025
DOCKET	25-cv-02674-RFL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a habeas petition under 28 U.S.C. § 2254 challenging conditions of confinement and moved to proceed in forma pauperis.
STANDARD OF REVIEW	The court reviewed the habeas petition to determine whether the claims were cognizable under 28 U.S.C. § 2254 and whether a certificate of appealability should issue.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Tracy S. Smith v. Santa Clara County

TOPICS

federal habeas corpus · section 1983 · prisoners rights · civil procedure

PRACTICE AREAS

habeas corpus · prisoner civil rights · federal civil procedure

QUESTIONS PRESENTED

1. Whether claims challenging jail conditions, including cell assignment, law-library access, and seizure of property, are cognizable in a habeas action under 28 U.S.C. § 2254.
2. Whether the district court should construe the habeas petition as a civil rights complaint under 42 U.S.C. § 1983.
3. Whether a certificate of appealability should issue.

HOLDINGS

1. Challenges to the terms and conditions of confinement are not the proper subject of a habeas action and must be brought as a civil rights action under 42 U.S.C. § 1983.
2. Although a district court may construe a habeas petition as a civil rights action, it is not required to do so.
3. A certificate of appealability will not issue because Petitioner did not show that reasonable jurists would debate whether the petition states a valid constitutional claim or whether the district court's procedural ruling was correct.

KEY QUOTATIONS

> *"His claims are not the proper subject of a habeas action, but must be brought as a civil rights action under 42 U.S.C. § 1983."* (at 1)

> *"Although a district court may construe a habeas petition as a civil rights action, it is not required to do so."* (at 2)

FACTUAL BACKGROUND

The petition sought relief from state convictions but alleged that county jail officials denied Petitioner a single cell, failed to provide sufficient law-library access, and took his electronic tablet. The court treated these allegations as challenges to the terms and conditions of confinement rather than challenges to the legality or duration of confinement.

PROCEDURAL HISTORY

Smith filed a petition styled as a habeas action seeking relief concerning a single-cell assignment, law-library access, and seizure of an electronic tablet by county jail officials. The district court concluded that these claims challenge conditions of confinement and therefore belong in a civil rights action under 42 U.S.C. § 1983. The court declined to convert the petition, dismissed the action without prejudice, granted in forma pauperis status, denied a certificate of appealability, and directed the Clerk to enter judgment and close the file.

DISPOSITION

dismissed

CASES CITED

- Badea v. Cox, 931 F.2d 573, 574 (9th Cir. 1991)
- Crawford v. Bell, 599 F.2d 890, 891-92 & n.1 (9th Cir. 1979)
- Wilwording v. Swenson, 404 U.S. 249, 251 (1971)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)

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