

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Robert Hart v. Edgardo Sandoval, an individual, and County of
Tulare, a public entity

Hart · No. 1:24-cv-00071-HBK · Decided September 18, 2025

SUMMARY

The United States District Court for the Eastern District of California denies Defendants’ request for judicial notice and grants their motion for summary judgment in Robert Hart’s civil-rights action. Hart alleged that Deputy Edgardo Sandoval arrested him without a warrant or probable cause and asserted related equal-protection and municipal-liability claims against Sandoval and the County of Tulare. The court determined that no material facts were in dispute and ruled for Defendants.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 18, 2025
DOCKET	1:24-cv-00071-HBK
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for summary judgment after discovery on Plaintiff's 42 U.S.C. § 1983 claims for false arrest and imprisonment and denial of equal protection. The court denied Defendants' request for judicial notice and granted the motion for summary judgment on all claims.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The evidence must be viewed in the light most favorable to the nonmoving party, but credibility determinations and weighing of evidence are improper. For qualified immunity, whether the facts could support a reasonable belief in probable cause is a question of law, while factual disputes are viewed under the summary-judgment standard.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

PARTIES

Robert Hart v. Edgardo Sandoval, County of Tulare

TOPICS

section 1983

summary judgment

qualified immunity

police misconduct

equal protection

PRACTICE AREAS

civil rights

constitutional law

civil procedure

police misconduct

municipal liability

QUESTIONS PRESENTED

1. Whether Deputy Sandoval arrested Hart without probable cause in violation of the Fourth Amendment.
2. Whether Deputy Sandoval was entitled to qualified immunity even if probable cause was lacking.
3. Whether Hart presented sufficient evidence to establish an equal protection claim under § 1983.
4. Whether the County of Tulare could be liable under Monell for the alleged constitutional violations.
5. Whether Defendants' request for judicial notice of state-court domestic-violence filings should be granted.

HOLDINGS

1. Deputy Sandoval had probable cause to arrest Hart for domestic violence because, under the totality of the circumstances known at the time of arrest, the reports from Lily and corroborating witnesses provided reasonably trustworthy information that Hart had committed domestic battery.
2. Deputy Sandoval was alternatively entitled to qualified immunity because, even if probable cause were lacking, it was reasonably arguable that probable cause existed and clearly established law did not place the unlawfulness of his conduct beyond debate.
3. Hart failed to establish an equal protection claim because he presented no argument or evidence showing that he was treated differently from a similarly situated person.
4. The County of Tulare was entitled to summary judgment because Hart failed to establish an underlying constitutional violation, which is necessary for municipal liability under Monell.

KEY QUOTATIONS

“Considering the totality of the circumstances known to Sandoval, probable cause existed to arrest Plaintiff for domestic violence.” (Discussion § IV.A.2)

“Accordingly, no constitutional violation occurred.” (Discussion § IV.A.2)

“Defendants’ Motion for Summary Judgment (Doc. No. 24) is GRANTED.” (Order)

FACTUAL BACKGROUND

On January 18, 2022, deputies responded to Plaintiff's residence after reports of domestic violence involving his wife, Lily Hart. During a later visit, Lily reported that Hart had pushed her that morning, had previously beaten

and strangled her, had threatened to kill her, and had access to unsecured firearms; other witnesses provided corroborating information, including photographs and statements expressing concern for Lily's safety. Deputy Sandoval relayed the information to a judge, who issued an emergency protective order with a move-out provision, and Sandoval arrested Hart when he returned to the property. Hart disputed Lily's credibility and argued that the arrest lacked probable cause and occurred in the home's curtilage.

PROCEDURAL HISTORY

Hart filed the civil rights complaint on January 17, 2024. Defendants answered on May 6, 2024, and, after discovery, moved for summary judgment on June 23, 2025. Hart opposed the motion, withdrew an untimely cross-motion for partial summary judgment, and Defendants filed a reply. The magistrate judge decided the matter without oral argument, granted summary judgment, directed entry of judgment for Defendants, vacated deadlines, and closed the case.

DISPOSITION

other

CASES CITED

- *Rodis v. City and County of San Francisco*, 558 F.3d 964, 970-971 (9th Cir. 2009)
- *Monell v. Department of Social Services*, 436 U.S. 658, 694-95 (1978)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 322-23 (1986)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248, 252 (1986)
- *Matsushita Electric Industrial Co. v. Zenith Radio Corp.*, 475 U.S. 574, 586-87 & n.11 (1986)
- *T.W. Electrical Service, Inc. v. Pacific Electric Contractors Association*, 809 F.2d 626, 630 (9th Cir. 1987)
- *Triton Energy Corp. v. Square D. Co.*, 68 F.3d 1216, 1221 (9th Cir. 1995)
- *Henry v. Gill Industries, Inc.*, 983 F.2d 943, 950 (9th Cir. 1993)
- *Manley v. Rowley*, 847 F.3d 705, 711 (9th Cir. 2017)
- *Orr v. Bank of America, NT & SA*, 285 F.3d 764, 772 (9th Cir. 2002)
- *Spencer v. Pew*, 2024 WL 4297515, at *1 (9th Cir. Sept. 16, 2024)
- *Scott v. Harris*, 550 U.S. 372, 380-81 (2007)
- *Reyn's Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d 741, 746 n.6 (9th Cir. 2006)
- *Mullis v. United States Bankruptcy Court*, 828 F.2d 1385, 1388 n.9 (9th Cir. 1987)
- *United States ex rel. Robinson Rancheria Citizens Council v. Borneo, Inc.*, 971 F.2d 244, 248 (9th Cir. 1992)
- *Trigueros v. Adams*, 658 F.3d 983, 987 (9th Cir. 2011)
- *Walker v. Woodford*, 454 F. Supp. 2d 1007, 1022 (S.D. Cal. 2006)
- *Allen v. City of Portland*, 73 F.3d 232, 236 (9th Cir. 1996)
- *Wong Sun v. United States*, 371 U.S. 471, 482 (1963)
- *Lange v. California*, 594 U.S. 295, 301 (2021)
- *United States v. Brobst*, 558 F.3d 982, 997 (9th Cir. 2009)

- Johnson v. Barr, 79 F.4th 996, 1003, 1005 (9th Cir. 2023)
- Owen v. City of Independence, 445 U.S. 622, 637 (1980)
- United States v. Del Vizo, 918 F.2d 821, 825 (9th Cir. 1990)
- Maryland v. Pringle, 540 U.S. 366, 371 (2003)
- Miller v. City of Scottsdale, 88 F.4th 800, 804 (9th Cir. 2023)
- Vanegas v. City of Pasadena, 46 F.4th 1159, 1164 (9th Cir. 2022)
- Kaley v. United States, 571 U.S. 320, 338 (2014)
- United States v. Magallon-Lopez, 817 F.3d 671, 675 (9th Cir. 2016)
- Edgerly v. City & County of San Francisco, 599 F.3d 946, 954 (9th Cir. 2010)
- Devenpeck v. Alford, 543 U.S. 146, 153 (2004)
- Whren v. United States, 517 U.S. 806, 812-13 (1996)
- District of Columbia v. Wesby, 583 U.S. 48, 62-63 (2018)
- Reichle v. Howards, 566 U.S. 658, 664 (2012)
- Harlow v. Fitzgerald, 457 U.S. 800, 817 (1982)
- Vos v. City of Newport Beach, 892 F.3d 1024, 1035 (9th Cir. 2018)
- Moran v. Washington, 47 F.3d 839, 844 (9th Cir. 1995)
- United States v. Lowe, 676 F. App'x 728, 732 (9th Cir. 2017)
- Lopez-Rodriguez v. Mukasey, 536 F.3d 1012, 1016 (9th Cir. 2008)
- United States v. Struckman, 603 F.3d 731, 739 (9th Cir. 2010)
- United States v. Mota, 982 F.2d 1384, 1388 (9th Cir. 1993)
- Hartmann v. California Department of Corrections and Rehabilitation, 707 F.3d 1114, 1123 (9th Cir. 2013)
- Thornton v. City of St. Helens, 425 F.3d 1158, 1166 (9th Cir. 2005)
- Koboyashi v. McMulling, 2022 WL 3137958, at *23 (C.D. Cal. May 31, 2022)
- Nissan Fire & Marine Insurance Co. v. Fritz Companies, Inc., 210 F.3d 1099, 1103, 1106 (9th Cir. 2000)
- Lockett v. County of Los Angeles, 977 F.3d 737, 741 (9th Cir. 2020)
- Scott v. Heinrich, 39 F.3d 912, 916 (9th Cir. 1994)