

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Carlos Williams v. County of Sacramento, et al.

Williams · No. 2:19-cv-02345-TLN-CSK · Decided April 18, 2025

SUMMARY

The United States District Court for the Eastern District of California sustained Plaintiff Carlos Williams’s objections to Defendant City of Rancho Cordova’s \$14,444.79 bill of costs. The court declined to award costs because Defendant failed to submit the memorandum of costs required by Eastern District of California Local Rule 292(b).

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Troy L. Nunley
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 18, 2025
DOCKET	2:19-cv-02345-TLN-CSK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff objected to Defendant's post-judgment bill of costs after the Court granted Defendant's motion for summary judgment.
STANDARD OF REVIEW	The Court applied the requirements of Federal Rule of Civil Procedure 54(d)(1) and Eastern District of California Local Rule 292(b) in exercising its discretion over an award of costs.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- costs
- summary judgment
- civil procedure

PRACTICE AREAS

- civil procedure
- civil rights

QUESTIONS PRESENTED

1. Whether Defendant's bill of costs should be awarded when Defendant failed to submit the memorandum of costs required by Eastern District of California Local Rule 292(b).

HOLDINGS

1. A prevailing party's bill of costs must be accompanied by the memorandum of costs required by Local Rule 292(b), and Defendant's failure to submit that memorandum justified declining to award its claimed costs.

KEY QUOTATIONS

“By its terms, the rule creates a presumption in favor of awarding costs to a prevailing party, but vests in the [Court] discretion to refuse to award costs.” (at 2)

“The Court finds Defendant fails to comply with Local Rule 292(b) because it did not submit a memorandum of costs with its submission of the bill of costs.” (at 3)

FACTUAL BACKGROUND

After prevailing on summary judgment, Defendant submitted a bill of costs totaling \$14,444.79 for clerk fees, service fees, and transcript-related expenses. The submission included an attorney affidavit and invoices but did not include the memorandum of costs required by Eastern District of California Local Rule 292(b). Plaintiff objected, and Defendant filed no response.

PROCEDURAL HISTORY

On January 21, 2025, the Court granted Defendant's motion for summary judgment. Defendant then submitted a \$14,444.79 bill of costs without a memorandum of costs. Plaintiff objected under Eastern District of California Local Rule 292(b), Defendant did not respond, and the Court sustained the objection and declined to award the claimed costs.

DISPOSITION

other

CASES CITED

- Ass'n of Mexican-Am. Educators v. State of Cal., 231 F.3d 572, 591 (9th Cir. 2000)
- Save Our Valley v. Sound Transit, 335 F.3d 932, 945 (9th Cir. 2003)
- Oyarzo v. Tuolumne Fire Dist., No. 1:11-cv-01271-LJO, 2013 WL 5718877, at *4 (E.D. Cal. Oct. 18, 2013)