

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Turner v. Singh

Turner v. Singh · No. 2:23-cv-00954 DC SCR P · Decided June 30, 2025

SUMMARY

The United States District Court for the Eastern District of California lifts the stay in Lafonzo R. Turner’s § 1983 action and directs defendants to file a responsive pleading. The court recommends denying Turner’s motion to enforce a 2018 global settlement agreement arising from separate Northern District of California cases, concluding that it lacks jurisdiction to enforce the agreement or reopen those cases under Rule 60(b)(6). The court also concludes that Federal Rules of Civil Procedure 70 and 71 do not provide a basis for enforcement because the agreement was not a judicially sanctioned judgment.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 30, 2025
DOCKET	2:23-cv-00954 DC SCR P
DISPOSITION	other
PROCEDURAL POSTURE	A state prisoner filed a motion in his Eastern District of California § 1983 action seeking to enforce a global settlement agreement resolving two earlier Northern District of California civil-rights actions. The magistrate judge ordered the stay lifted, directed defendants to file a responsive pleading, and issued findings and recommendations that the motion be denied.
STANDARD OF REVIEW	The motion was evaluated under the jurisdictional requirements for ancillary jurisdiction, Rule 60(b)(6), and Rules 70 and 71. The findings and recommendations were issued under 28 U.S.C. § 636(b) (1), subject to de novo review of timely objections by the assigned district judge.
PRECEDENTIAL VALUE	Unknown; magistrate judge's order and findings and recommendations, with no reporter citation.

TOPICS

subject matter jurisdiction

motion for reconsideration

civil procedure

remedies

PRACTICE AREAS

civil procedure

prisoner civil rights

settlement enforcement

federal jurisdiction

QUESTIONS PRESENTED

1. Whether the Eastern District of California had ancillary jurisdiction to enforce a settlement agreement resolving different actions in the Northern District of California.
2. Whether Federal Rule of Civil Procedure 60(b)(6) supplied an independent basis for federal jurisdiction or authorized this court to reopen the Northern District cases.
3. Whether Federal Rules of Civil Procedure 70 and 71 authorized enforcement of the settlement agreement as a judgment or order.

HOLDINGS

1. The Eastern District of California lacked ancillary jurisdiction to enforce the 2018 global settlement agreement because neither the agreement nor the Northern District dismissal orders retained jurisdiction, and any enforcement authority would belong to the court that entered the dismissal orders.
2. Federal Rule of Civil Procedure 60(b)(6) does not independently confer federal jurisdiction and cannot authorize the Eastern District of California to reopen another district court's dismissed cases.
3. Rules 70 and 71 did not authorize enforcement of the settlement agreement because those rules apply to enforcement of judgments or orders, and the agreement was not a judicially sanctioned final judgment enforceable by this court.

KEY QUOTATIONS

“Federal courts “have no inherent power to enforce settlement agreements entered into by parties litigating before them.”” (at 1)

“Enforcement of the settlement agreement ... is more than just a continuation or renewal of the dismissed suit, and hence requires its own basis for jurisdiction.” (at 1-2)

“Jurisdiction, however, is not derived from Rule 60(b)(6) itself.” (at 3)

“Rules 70 and 71, however, provide only for the “enforcement of judgments.”” (at 4)

FACTUAL BACKGROUND

Turner is a state prisoner proceeding pro se under 42 U.S.C. § 1983. In April 2018, he entered a global settlement agreement resolving two civil-rights actions in the Northern District of California. He alleged that

prison officials were denying durable medical equipment and medical chronos required by that agreement. The agreement and voluntary dismissal orders did not retain federal-court jurisdiction over enforcement proceedings, and Turner sought enforcement in this separate Eastern District action.

PROCEDURAL HISTORY

The case was referred to a post-screening alternative-dispute-resolution pilot project and stayed. A settlement conference was held on June 23, 2024, but the case did not settle. Turner then moved to enforce a 2018 global settlement agreement from two Northern District of California actions under Federal Rules of Civil Procedure 70, 71, and 60(b)(6). The magistrate judge concluded that this court lacked jurisdiction to enforce or reopen the Northern District cases and recommended denial of the motion.

DISPOSITION

other

CASES CITED

- K.C. ex rel. Erica C. v. Torlakson, 762 F.3d 963 (9th Cir. 2014)
- Arata v. Nu Skin International, Inc., 96 F.3d 1265 (9th Cir. 1996)
- Kelly v. Wengler, 822 F.3d 1085 (9th Cir. 2016)
- O'Connor v. Colvin, 70 F.3d 530 (9th Cir. 1995)
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375 (1994)
- Julian v. Central Trust Co., 193 U.S. 93 (1904)
- Giraldes v. Nicolai, No. 2:16-cv-0497 KJM AC P, 2017 WL 3887550 (E.D. Cal. Sept. 6, 2017)
- BLOM Bank SAL v. Honickman, 145 S. Ct. 1612 (2025)
- Keeling v. Sheet Metal Workers International Association, Local Union 162, 937 F.2d 408 (9th Cir. 1991)
- Delay v. Gordon, 475 F.3d 1039 (9th Cir. 2007)
- In re Hunter, 66 F.3d 1002 (9th Cir. 1995)
- Cathey v. Brown, No. 2:18-cv-0386 JAM AC PS, 2018 WL 3218444 (E.D. Cal. July 2, 2018)
- Kalt v. Hunter, 66 F.3d 1002 (9th Cir. 1995)
- Peterson v. Highland Music, Inc., 140 F.3d 1313 (9th Cir. 1998)
- McCabe v. Arave, 827 F.2d 634 (9th Cir. 1987)
- De Beers Consolidated Mines v. United States, 325 U.S. 212 (1945)
- Harris v. County of Orange, 682 F.3d 1126 (9th Cir. 2012)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)
- Arizona Health Care Cost Containment System v. Centers for Medicare & Medicaid Services, 582 F. Supp. 3d 690 (D. Ariz. 2022)