

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Gabriel Magallanes v. N. Sanchez

Magallanes v. Sanchez · No. 1:24-cv-01095-KES-EPG (PC) · Decided March 17, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends dismissing Gabriel Magallanes’s due process challenge to a prison Rules Violation Report with prejudice for failure to state a claim. The court recommends dismissing newly added, unrelated claims without prejudice because they improperly join defendants and claims and fail to satisfy Federal Rule of Civil Procedure 8. The court also recommends closing the case and advises that objections are due within 30 days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 17, 2025
DOCKET	1:24-cv-01095-KES-EPG (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Screening order and magistrate judge's findings and recommendations on a prisoner's First Amended Complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The complaint was reviewed under the screening requirements of 28 U.S.C. § 1915A. The court applied the Rule 8 plausibility standard, requiring sufficient factual matter to state a claim, and evaluated the disciplinary claim under the procedural protections of Wolff v. McDonnell and the some-evidence standard of Superintendent v. Hill.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Gabriel Magallanes v. N. Sanchez

TOPICS

- prisoners rights
- section 1983
- due process
- joinder
- pleadings

PRACTICE AREAS

- prisoner civil rights
- federal civil procedure
- constitutional due process

QUESTIONS PRESENTED

1. Whether the First Amended Complaint plausibly alleged that the prison disciplinary proceeding violated procedural due process.
2. Whether the new claims against additional defendants were properly joined with the disciplinary claim under Federal Rules of Civil Procedure 18 and 20.
3. Whether the new allegations satisfied Federal Rule of Civil Procedure 8(a)(2)'s requirement of a short and plain statement showing entitlement to relief.
4. Whether further leave to amend should be granted.

HOLDINGS

1. The First Amended Complaint failed to state a procedural due-process claim because the allegation that Plaintiff was found guilty on 'no evidence' was conclusory and did not allege that any required Wolff procedure was denied or that the record lacked some reliable evidence supporting the finding.
2. The claims concerning housing, mail, medical care, and equal protection were improperly joined with the disciplinary claim because they involved different defendants, different events, and a different prison, and therefore were not part of the same transaction or occurrence or a common question of law or fact.
3. The new allegations failed to satisfy Rule 8(a)(2) because they provided only brief, conclusory assertions about mail, medical care, housing, and equal protection without clearly identifying the claims, defendants' conduct, or supporting facts.

KEY QUOTATIONS

“Prison disciplinary proceedings are not part of a criminal prosecution, and the full panoply of rights due a defendant in such proceedings does not apply.”” (Opinion p. 5)

“The “some evidence” standard is minimally stringent, and the relevant inquiry is whether “there is any evidence in the record that could support the conclusion reached.”” (Opinion p. 6)

“Unrelated claims against different defendants belong in different suits, not only to prevent the sort of morass [a multiple claim, multiple defendant] suit produce[s], but also to ensure that prisoners pay the required filing fees” (Opinion p. 8)

FACTUAL BACKGROUND

Plaintiff, a state prisoner, challenged a Rules Violation Report accusing him of indecent exposure at Wasco State Prison. He alleged that the disciplinary finding was unsupported by evidence and noted that a criminal case had been dismissed for insufficient evidence, but he did not identify any procedural protection that was denied or explain what evidence was considered. In his amended pleading, he also added unrelated allegations concerning housing at High Desert State Prison, mail delivery, medical care, and equal protection involving several new defendants.

PROCEDURAL HISTORY

Plaintiff filed a pro se § 1983 complaint on September 16, 2024. The court screened the original complaint, found no cognizable claims, and granted leave to amend. Plaintiff filed a First Amended Complaint adding claims and defendants. The court recommended dismissing the due-process challenge to a prison disciplinary finding with prejudice, dismissing the new unrelated claims without prejudice, denying further leave to amend, and closing the case, subject to objections and review by the assigned district judge.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 676-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Doe I v. Wal-Mart Stores, Inc., 572 F.3d 677, 681 (9th Cir. 2009)
- Hebbe v. Pliler, 627 F.3d 338, 342 (9th Cir. 2010)
- Graham v. Connor, 490 U.S. 386, 393-94 (1989)
- Baker v. McCollan, 443 U.S. 137, 144 n.3 (1979)
- Chapman v. Houston Welfare Rights Org., 441 U.S. 600, 618 (1979)
- Hall v. City of Los Angeles, 697 F.3d 1059, 1068 (9th Cir. 2012)
- Crowley v. Nevada, 678 F.3d 730, 734 (9th Cir. 2012)
- Anderson v. Warner, 451 F.3d 1063, 1067 (9th Cir. 2006)
- Long v. County of Los Angeles, 442 F.3d 1178, 1185 (9th Cir. 2006)
- Marsh v. County of San Diego, 680 F.3d 1148, 1158 (9th Cir. 2012)
- Preschooler II v. Clark County School Board of Trustees, 479 F.3d 1175, 1183 (9th Cir. 2007)
- Johnson v. Duffy, 588 F.2d 740, 743 (9th Cir. 1978)
- Arnold v. International Business Machines Corp., 637 F.2d 1350, 1355 (9th Cir. 1981)
- Harper v. City of Los Angeles, 533 F.3d 1010, 1026 (9th Cir. 2008)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658, 691, 695 (1978)
- Wolff v. McDonnell, 418 U.S. 539, 556, 564-70 (1974)
- Hewitt v. Helms, 459 U.S. 460, 466-68 (1983)
- Sandin v. Conner, 515 U.S. 472, 481-84 (1995)
- Superintendent v. Hill, 472 U.S. 445, 455-56 (1985)
- Cato v. Rushen, 824 F.2d 703, 705 (9th Cir. 1987)
- K'Napp v. California Department of Corrections, 2013 U.S. Dist. LEXIS 155165, at *4 (E.D. Cal. Oct. 29, 2013)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- K'Napp v. California Department of Corrections and Rehabilitation, 599 Fed. App'x 791 (9th Cir. 2015)
- Coughlin v. Rogers, 130 F.3d 1348, 1350 (9th Cir. 1997)

- Washington v. Fresno County Sheriff, 2014 WL 641137, at *2 (E.D. Cal. Feb. 18, 2014)
- Lake v. City of Vallejo, 2023 U.S. Dist. LEXIS 154538, at *4-5 (E.D. Cal. Aug. 31, 2023)
- Ketab Corp. v. Mesriani & Associates, 2015 U.S. Dist. LEXIS 163133, at *22 (C.D. Cal. Dec. 4, 2015)
- Diaz v. CDCR, 2024 U.S. Dist. LEXIS 14346, at *6 (E.D. Cal. Jan. 26, 2024)
- Lehman v. Nelson, 862 F.3d 1203, 1211 (9th Cir. 2017)
- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)

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