

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Chase v. Coalinga State Hospital

No. 1:25-cv-00349 GSA (PC) (E.D. Cal. May 2, 2025) · No. 1:25-cv-00349 GSA (PC) · Decided May 2, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Harry Chase’s non-prisoner application to proceed in forma pauperis in an action under 42 U.S.C. § 1983. The court explains that, as a civil detainee, Plaintiff is not a prisoner under the Prison Litigation Reform Act and therefore is not required to submit a prisoner trust-account statement or exhaust administrative remedies.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Gary S. Austin
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	May 2, 2025
DOCKET	1:25-cv-00349 GSA (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff proceeding pro se and apparently as a civil detainee applied to proceed in forma pauperis in an action seeking relief under 42 U.S.C. § 1983.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order

TOPICS

- civil procedure
- section 1983
- prisoners rights

PRACTICE AREAS

- civil procedure
- civil rights
- prisoner and civil detainee litigation

QUESTIONS PRESENTED

- Whether Plaintiff demonstrated eligibility to proceed in forma pauperis under 28 U.S.C. § 1915(a).

2. Whether a civil detainee is a prisoner for purposes of the Prison Litigation Reform Act's trust-account and administrative-exhaustion requirements.

HOLDINGS

1. Plaintiff's declaration made the showing required by 28 U.S.C. § 1915(a), so his application to proceed in forma pauperis was granted.
2. A civil detainee is not a prisoner within the meaning of the Prison Litigation Reform Act and therefore is not required to provide a prisoner trust-fund account statement or exhaust administrative remedies, so long as the detainee status remains unchanged.

KEY QUOTATIONS

“As a civil detainee, Plaintiff is not a prisoner within the meaning of the Prison Litigation Reform Act.” (1)

“Accordingly, IT IS HEREBY ORDERED that Plaintiff’s application to proceed in forma pauperis (ECF No. 4) is GRANTED.” (1)

FACTUAL BACKGROUND

Harry Chase, III, proceeding pro se, filed an action under 42 U.S.C. § 1983 and stated that he was incarcerated at Coalinga State Hospital. The court treated him as an individual who appeared to be civilly committed and therefore a civil detainee rather than a prisoner under the Prison Litigation Reform Act. Chase submitted a declaration supporting his request to proceed without prepaying the filing fee.

PROCEDURAL HISTORY

Plaintiff filed a civil rights complaint and an application to proceed in forma pauperis. The matter was referred to a United States Magistrate Judge under 28 U.S.C. § 636(b)(1)(B) and Local Rule 302. The court granted the application based on Plaintiff's declaration.

DISPOSITION

other

CASES CITED

- Page v. Torrey, 201 F.3d 1136, 1140 (9th Cir. 2000)