

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jake LeBeaux v. State of California, et al.

LeBeaux · No. 1:25-cv-01809-CDB (PC) · Decided December 17, 2025

SUMMARY

The United States District Court for the Eastern District of California orders pro se Plaintiff Jake LeBeaux to show cause within 21 days why his claims under 42 U.S.C. § 1983, the ADA, and the Rehabilitation Act should not be dismissed as time-barred. The court concludes that the alleged injuries from 2005 through 2011 appear untimely and finds that the complaint does not establish a basis for sufficient tolling; it also notes that the Indian Child Welfare Act does not appear relevant to the claims.

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	December 17, 2025
DOCKET	1:25-cv-01809-CDB (PC)
DISPOSITION	other
PROCEDURAL POSTURE	After Plaintiff filed a pro se complaint asserting constitutional, civil-rights, disability, and Indian Child Welfare Act claims, the district court issued an order to show cause why the action should not be dismissed as time-barred.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jake LeBeaux v. State of California, et al.

TOPICS

- statute of limitations
- section 1983
- ada / disability
- civil rights
- indian child welfare act

PRACTICE AREAS

- civil procedure
- civil rights
- disability law
- constitutional law
- Indian law

QUESTIONS PRESENTED

1. Whether Plaintiff's § 1983 claims appeared barred by California's applicable statute of limitations, including applicable minority and incarceration tolling.
2. Whether Plaintiff's ADA and Rehabilitation Act claims appeared barred by the analogous California personal-injury limitations period and applicable tolling rules.
3. Whether the allegations stated any apparent basis for applying tolling sufficient to make claims arising between 2005 and 2011 timely.
4. Whether the ICWA allegations appeared relevant to the claims asserted in this action.
5. Whether Plaintiff should be required to show cause why the action should not be dismissed as time-barred.

HOLDINGS

1. For purposes of the show-cause determination, California's two-year personal-injury limitations period applies to § 1983 claims, subject to applicable California tolling rules, including tolling for minority and incarceration within the limits recognized by California law.
2. A § 1983 claim accrues when the plaintiff knows or has reason to know of the injury that forms the basis of the action; awareness of the full extent of injury is not required.
3. Because the ADA and Rehabilitation Act do not contain statutes of limitations, the court applied the most analogous state limitations period; under the approach discussed in the order, the claims appeared subject to California's two-year personal-injury period, with potentially two additional years of applicable prisoner tolling.
4. The court required Plaintiff to show cause in writing within 21 days why the action should not be dismissed as time-barred.

KEY QUOTATIONS

“Accordingly, to proceed on these claims, Plaintiff must either establish that his claims accrued at a later date and/or that the limitations period for those claims should be equitably tolled.” (at 2)

“Accordingly, IT IS HEREBY ORDERED that Plaintiff show cause in writing within 21 days from the date of service of this order why this action should not be dismissed as time-barred.” (at 2)

FACTUAL BACKGROUND

Plaintiff alleged that while he was a minor incarcerated in California youth institutions from 2005 through 2011, state actors subjected him to extreme force, cell extractions, prolonged solitary confinement, forced psychotropic medication, fabricated disciplinary write-ups, and retaliatory transfers. He alleged that he entered the California Youth Authority in May 2005 at age 16 and that he is an enrolled member of the Navajo Nation. He also alleged continuing psychiatric treatment after his release and asserted claims under 42 U.S.C. § 1983, the Eighth and Fourteenth Amendments, the ADA, the Rehabilitation Act, and ICWA. The complaint was filed in December 2025.

PROCEDURAL HISTORY

Plaintiff filed the complaint on December 11, 2025. Before adjudicating the claims on the merits or entering a dismissal, the court concluded that the claims appeared untimely and ordered Plaintiff to show cause in writing within 21 days why the action should not be dismissed. The court warned that failure to respond could result in a recommendation of dismissal for untimeliness, failure to obey court orders, and failure to prosecute.

DISPOSITION

other

CASES CITED

- Lukovsky v. City & County of San Francisco, 535 F.3d 1044, 1048 (9th Cir. 2008)
- Doe #1 M.L. v. San Bernardino Sheriff Department, 753 F. Supp. 3d 1024, 1028 (C.D. Cal. 2024)
- Soto v. Sweetman, 882 F.3d 865, 871-72 (9th Cir. 2018)
- Roe v. Reynolds, No. 2:25-CV-01070-JAM-JDP, 2025 WL 2172285, at *3 (E.D. Cal. July 31, 2025)
- Elliott v. City of Union City, 25 F.3d 800, 801-02 (9th Cir. 1994)
- Pickern v. Holiday Quality Foods Inc., 293 F.3d 1133, 1137 n.2 (9th Cir. 2002)
- Daviton v. Columbia/HCA Healthcare Corp., 241 F.3d 1131, 1136 n.8 (9th Cir. 2001)
- Horel, No. C 10-153 SI PR, 2011 WL 2883632, at *2 (N.D. Cal. July 19, 2011)
- J.W. ex rel. J.E.W. v. Fresno Unified School District, 570 F. Supp. 2d 1212, 1222 (E.D. Cal. 2008)
- Alexopulos By & Through Alexopulos v. San Francisco Unified School District, 817 F.2d 551, 555 (9th Cir. 1987)
- Gregg v. Hawaii, Department of Public Safety, 870 F.3d 883, 887 (9th Cir. 2017)
- Bibeau v. Pacific Northwest Research Foundation, Inc., 188 F.3d 1105, 1108 (9th Cir. 1999)
- Mandujano v. Lester, No. 2:23-2385-DJC-CKD (PS), 2025 WL 901077, at *3 (E.D. Cal. Mar. 25, 2025)
- Haaland v. Brackeen, 599 U.S. 255, 265 (2023)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF
CALIFORNIA 10 11 JAKE LEBEAUX, Case No. 1:25-cv-01809-CDB (PC) 12 Plaintiff, ORDER
TO SHOW CAUSE IN WRITING WHY ACTION SHOULD NOT BE 13 v. DISMISSED AS
TIME-BARRED 14 STATE OF CALIFORNIA, et al., (Doc. 1) 15 Defendants. 21-DAY
DEADLINE 16 17 18 Background 19 Plaintiff Jake LeBeaux (“Plaintiff”), proceeding pro se,
initiated this action with the filing 20 of a complaint on December 11, 2025.

(Doc. 1). Plaintiff asserts violations of the Eighth and 21 Fourteenth Amendments, pursuant to 42
U.S.C. § 1983, and of the Americans with Disabilities 22 Act (“ADA”), the Rehabilitation Act,
and the Indian Child Welfare Act (“ICWA”) against 23 Defendant State of California, as well as
numerous other state actors (collectively, “Defendants”). 24 See id. 25 Plaintiff states that,
between 2005 and 2011 and while a minor incarcerated in different 26 state institutions,

Defendants subjected Plaintiff to extreme force, daily cell extractions, prolonged 27 solitary confinement, forced psychotropic drugging, fabricated disciplinary write-ups, and 28 retaliatory transfers.

Id. at 2-3, 9. Plaintiff asserts that he entered the California Youth Authority 1 (“CYA”) in May 2005 at the age of 16, and as an enrolled member of the Navajo Nation – Eastern 2 Agency, a federally recognized tribe. Id. at 10. Plaintiff describes numerous instances of alleged 3 abuse within state facilities where he was incarcerated, from 2005 to 2011. Id. at 10-17.

Plaintiff 4 details continuous psychiatric treatment following release from confinement. Id. at 18-19. 5 Governing Law 6 State law determines the statute of limitations for § 1983 suits. *Lukovsky v. City & Cnty. 7 of San Francisco*, 535 F.3d 1044, 1048 (9th Cir. 2008).

The statute of limitations for a § 1983 suit 8 in California is two years. *Doe #1 M.L. v. San Bernardino Sheriff Dep’t*, 753 F. Supp. 3d 1024, 9 1028 (C.D. Cal. 2024) (citing Cal. Code Civ. Proc. § 335.1). Federal courts also apply the forum 10 state’s tolling rules when determining the applicable statute of limitations. *Soto v. Sweetman*, 882 11 F.3d 865, 871-72 (9th Cir.

2018). In California, the applicable statute of limitations is tolled while 12 a plaintiff is incarcerated, for a maximum period of two years. *Doe #1*, 753 F. Supp. 3d at 1028 13 (citing Cal. Code Civ. Proc. § 352.1(a)). California law also tolls the applicable statute of 14 limitations while a plaintiff is a minor. Cal. Code Civ. Proc. § 352. Tolling under § 352 lasts only 15 until a plaintiff reaches the age of majority.

See *Roe v. Reynolds*, No. 2:25-CV-01070-JAM-JDP, 16 2025 WL 2172285, at *3 (E.D. Cal. July 31, 2025) (citing Cal. Code Civ. Proc. § 352). 17 However, “[f]ederal law determines when a cause of action accrues and the statute of 18 limitations begins to run for a § 1983 action ... the claim accrues when the plaintiff knows or has 19 reason to know of the injury which is the basis of the action.” *Elliott v. City of Union City*, 25 F.3d 20 800, 801–02 (9th Cir.

1994) (citations and quotations omitted). 21 The ADA and Rehabilitation Act do not contain statutes of limitations. Courts must apply 22 the “statute of limitations of the most analogous state law.” *Pickern v. Holiday Quality Foods 23 Inc.*, 293 F.3d 1133, 1137 n.2 (9th Cir. 2002); see *Daviton v. Columbia/HCA Healthcare Corp.*, 24 241 F.3d 1131, 1136 n.8 (9th Cir.

2001). The Ninth Circuit has not decided which California state 25 law is applicable, but most district courts have applied California’s limit for personal injury actions 26 to ADA claims brought in California. Id. “A prisoner thus normally has four years to bring an 27 ADA claim for damages in California, i.e., the regular two years allowed under § 335.1 plus two 28 1 *Horel*, No. C 10-153 SI PR, 2011 WL 2883632, at *2 (N.D.

Cal. July 19, 2011). The same is true for Rehabilitation Act claims. See *J.W. ex rel. J.E.W. v. Fresno Unified Sch. Dist.*, 570 F. Supp. 3d 1212, 1222 (E.D. Cal. 2008) (citing, *inter alia*, *Daviton*, 241 F.3d at 1135).

Under federal law, as with § 1983 claims, a “cause of action accrues, and the statute of limitations begins to run, when a plaintiff knows or has reason to know of the injury that is the basis of the action.” *Alexopoulos v. San Francisco Unified Sch. Dist.*, 817 F.2d 551, 555 (9th Cir. 1987). Here, Plaintiff’s claims brought pursuant to § 1983 appear to be time-barred under the applicable statute of limitations.

Plaintiff’s claims are subject to a four-year statute of limitations, absent any additional tolling. Plaintiff asserts that the events that are the subject of his claims occurred from 2005 to 2011, and that he was 16 years of age in 2005. (Doc. 1 at 10-17). According to Plaintiff’s assertions, he became an adult, at the latest, in 2007. Plaintiff does not set forth any applicable basis for tolling of the statute of limitations past the year he reached the age of majority.

Thus, at the latest, the statute of limitations for any claims accruing prior to the date of Plaintiff reaching the age of majority began running sometime in 2007. It follows that the claims that accrued while Plaintiff was a minor became time-barred sometime in 2011, absent any tolling. Even the most recent of Plaintiff’s alleged claims began accruing in 2011, and thus became time-barred sometime in 2015, absent any additional tolling.

Accrual of § 1983 claims is dictated by the “discovery rule” which provides that a claim has accrued “when the plaintiff knows or has reason to know of the injury that is the basis of the action and the cause of that injury.” *Gregg v. Hawaii, Dept. of Public Safety*, 870 F.3d 883, 887 (9th Cir. 2017). This does not mean that a plaintiff must be aware of the full extent of the injuries for accrual to occur and a plaintiff must still be “diligent in discovering the critical facts.” *Bibeau v. Pac. Nw. Rsch. Found. Inc.*, 188 F.3d 1105, 1108 (9th Cir. 1999).

The abuse underlying Plaintiff’s claims allegedly began in 2005 and continued through 2011. The present action was filed in December 2025. See (Doc. 1). Plaintiff does not set forth facts asserting that he did not have reason to know of the injuries that are the basis of the claims. 1 || complaint would be untimely.

The same is true for Plaintiff’s ADA and Rehabilitation Act claims. 2 || Accordingly, to proceed on these claims, Plaintiff must either establish that his claims accrued at 3 || a later date and/or that the limitations period for those claims should be equitably tolled. 4 Lastly, the Indian Child Welfare Act (“ICWA”) is a “federal statute that aims to keep Indian 5 || children connected to Indian families; it governs state court adoption and foster care proceedings 6 || involving Indian children.” *Mandujano v. Lester*, No. 2:23-2385-DJC-CKD (PS), 2025 WL 7 || 901077, at *3 (E.D.

Cal. Mar. 25, 2025) (citing 25 U.S.C.A. § 1901 et. seg. & Haaland v. Brackeen, 8 } 599 U.S. 255, 265 (2023)), appeal dismissed, No. 25-3185, 2025 WL 2384060 (9th Cir. July 24, 9 || 2025). Based on the allegations in Plaintiff's complaint, ICWA does not appear to be relevant to 10 || the claims at issue. 11 In sum, Plaintiff has not alleged any basis to toll the statute of limitations accrual beyond 12 || the applicable statutes and the undersigned finds no tolling statutes applicable here that could 13 || conceivably cover a period of 10 years or more.

It follows that this action likely is time-barred 14 || under the applicable statute of limitations pursuant to California Code of Civil Procedure § 335.1, 15 || and any tolling provisions appear unlikely to render Plaintiff's claims timely.

Therefore, the 16 || undersigned will order Plaintiff to show cause in writing why this action should not be dismissed 17 || as time-barred. 18 Conclusion and Order 19 Accordingly, IT IS HEREBY ORDERED that Plaintiff show cause in writing within 21 20 || days from the date of service of this order why this action should not be dismissed as time-barred. 21 Any failure by Plaintiff to respond to this Order may result in the recommendation 22 || that this action be dismissed as being time-barred and for Plaintiff's failure to obey court 23 || orders and a failure to prosecute.

24 || IT IS SO ORDERED. 29 Dated: _ December 17, 2025 | Ww VV KD 26 UNITED STATES
MAGISTRATE JUDGE 27 28