

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PRECEDENTIAL VALUE	unpublished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)