

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Anthony Lee Williams v. Trimpey, et al.

Williams v. Trimpey · No. 2:24-cv-02148 SCR P · Decided July 21, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Anthony Lee Williams leave to proceed in forma pauperis and grants his motion to amend. The court finds that the second amended complaint fails to state cognizable claims under 42 U.S.C. § 1983, including ineffective assistance of counsel, unlawful search and seizure, and excessive bail claims, and permits amendment of certain claims within 30 days. The complaint is not served on the defendants.

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	July 21, 2025
DOCKET	2:24-cv-02148 SCR P
DISPOSITION	other
PROCEDURAL POSTURE	A county inmate proceeding pro se brought a 42 U.S.C. § 1983 action and moved to proceed in forma pauperis and to amend. The court screened the second amended complaint under 28 U.S.C. § 1915A, granted in forma pauperis status and the motion to amend, dismissed the second amended complaint for failure to state a cognizable claim, and granted leave to file a third amended complaint on specified claims.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss a prisoner complaint that is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant. In assessing failure to state a claim, the court accepts factual allegations as true and construes the complaint liberally, but conclusory allegations and formulaic recitations do not suffice; the complaint must contain enough factual matter to state a facially plausible claim.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order

PARTIES

Anthony Lee Williams v. Trimpey, Warren, et al.

TOPICS

section 1983

prisoners rights

motion to amend

civil procedure

constitutional law

PRACTICE AREAS

civil rights litigation

prisoner civil rights

federal civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the second amended complaint complied with Federal Rule of Civil Procedure 8 and stated cognizable claims under 42 U.S.C. § 1983.
2. Whether an ineffective-assistance-of-counsel claim arising from state criminal proceedings is cognizable under § 1983.
3. Whether the alleged excessive-bail claim stated a cognizable § 1983 claim when the complaint did not identify the defendant responsible for setting bail.
4. Whether plaintiff should be granted leave to amend the claims that might be cured by amendment.

HOLDINGS

1. The second amended complaint failed to satisfy Rule 8 and failed to state cognizable § 1983 claims because it did not clearly identify the defendants, the claims, or sufficient factual allegations connecting each defendant to an alleged constitutional deprivation.
2. An ineffective-assistance-of-counsel claim arising from state criminal proceedings is not cognizable under § 1983 and cannot be cured by amendment in this action.
3. The excessive-bail claim was dismissed without prejudice because the second amended complaint did not name a defendant responsible for setting bail; plaintiff was granted leave to amend if he could identify a nonimmune defendant and satisfy the applicable requirements.
4. Leave to amend was appropriate for the potentially curable claims, but not for the ineffective-assistance-of-counsel claim, which failed as a matter of law.

KEY QUOTATIONS

“Claims for ineffective assistance of counsel are not recognized under § 1983, despite the statute’s “literal applicability” to the Sixth Amendment, because specific appellate and habeas statutes apply.” (at 3)

“When a public defender is “performing a lawyer’s traditional functions as counsel to a defendant in a criminal proceeding,” a § 1983 claim does not lie.” (at 3)

“Leave to amend should be granted if it appears possible that the defects in the complaint could be corrected, especially if a plaintiff is pro se.” (at 5)

FACTUAL BACKGROUND

Plaintiff, a county inmate, alleged constitutional violations arising from his state criminal proceedings. He alleged ineffective assistance of counsel, an allegedly unlawful search and seizure of his cell phone and tablets directed by Detective Mohammad, and excessive bail set at \$750,000. He sought \$1.335 million in damages, but his second amended complaint did not clearly identify defendants or distinguish factual allegations from extensive summaries of legal authorities.

PROCEDURAL HISTORY

Plaintiff filed a prisoner civil-rights action, sought in forma pauperis status, and submitted a second amended complaint. The court granted the motion to amend and conducted statutory screening. It concluded that the second amended complaint failed to identify defendants and claims adequately, that the ineffective-assistance claim was not cognizable under § 1983, and that the excessive-bail claim failed to identify a responsible defendant. The complaint was not served, but plaintiff was given thirty days to file a third amended complaint; failure to do so would result in a recommendation of dismissal under Rule 41(b).

DISPOSITION

other

CASES CITED

- *Neitzke v. Williams*, 490 U.S. 319, 325 (1989)
- *Jackson v. Arizona*, 885 F.2d 639, 640 (9th Cir. 1989)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555-57, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Erickson v. Pardus*, 551 U.S. 89, 93-94 (2007)
- *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974)
- *Benavidez v. County of San Diego*, 993 F.3d 1134, 1144 (9th Cir. 2021)
- *Loux v. Rhay*, 375 F.2d 55, 57 (9th Cir. 1967)
- *Nelson v. Campbell*, 541 U.S. 637, 643 (2004)
- *Trimble v. City of Santa Rosa*, 49 F.3d 583, 585 (9th Cir. 1995) (per curiam)
- *Heck v. Humphrey*, 512 U.S. 477, 487 (1994)
- *Polk County v. Dodson*, 454 U.S. 312, 325 (1981)
- *United States v. Salerno*, 481 U.S. 739, 754 (1987)
- *Galen v. County of Los Angeles*, 477 F.3d 652, 661 (9th Cir. 2007)
- *Hill v. Bonta*, No. 2:24-cv-2884 EFB PC, 2024 WL 4989458, at *2 (E.D. Cal. Dec. 5, 2024)
- *Olsen v. Idaho State Board of Medicine*, 363 F.3d 916, 922-23 (9th Cir. 2004)
- *Schucker v. Rockwood*, 846 F.2d 1202, 1204 (9th Cir. 1988) (per curiam)
- *Reynaga Hernandez v. Skinner*, 969 F.3d 930, 937 n.1 (9th Cir. 2020)
- *Imbler v. Pachtman*, 424 U.S. 409, 430-31 (1976)
- *Kalina v. Fletcher*, 522 U.S. 118, 131 (1997)

- *Lopez v. Smith*, 203 F.3d 1122, 1130-31 (9th Cir. 2000) (en banc)
- *Cato v. United States*, 70 F.3d 1103, 1106 (9th Cir. 1995)
- *Rizzo v. Goode*, 423 U.S. 362, 370-71 (1976)
- *Arnold v. International Business Machines Corp.*, 637 F.2d 1350, 1355 (9th Cir. 1981)
- *Johnson v. Duffy*, 588 F.2d 740, 743 (9th Cir. 1978)
- *Ivey v. Board of Regents*, 673 F.2d 266, 268 (9th Cir. 1982)

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