

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Cesar N. Hernandez v. A. Constable, et al.

Hernandez v. Constable, No. 2:19-cv-02195-DC-SCR (PC) (E.D. Cal. Oct. 17, 2025) · No. 2:19-cv-02195-DC-SCR (PC) · Decided October 17, 2025

SUMMARY

The United States District Court for the Eastern District of California rules on the parties’ motions in limine in a prisoner civil rights action alleging deliberate indifference to serious medical needs under the Eighth Amendment. The court grants or partially grants several motions concerning lay testimony, relevance, settlement negotiations, prior proceedings, and untimely declarations, while reserving ruling on other evidentiary issues until trial. The order is signed by United States District Judge Dena M. Coggins and dated October 17, 2025.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dena Coggins
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	October 17, 2025
DOCKET	2:19-cv-02195-DC-SCR (PC)
DISPOSITION	other
PROCEDURAL POSTURE	The district court ruled on the parties' motions in limine before a scheduled jury trial in a 42 U.S.C. § 1983 action alleging deliberate indifference to serious medical needs.
STANDARD OF REVIEW	The court applied the Federal Rules of Evidence and its inherent authority to manage the course of trial. Motions in limine may be resolved in advance but rulings may be revised at trial when the evidentiary context develops.
PRECEDENTIAL VALUE	Unknown

TOPICS

- motion in limine
- evidence
- relevance
- hearsay
- impeachment

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff's criminal conviction and prison disciplinary history should be excluded or limited for impeachment purposes.
2. Whether Plaintiff may testify as a lay witness about medical or mental-health matters requiring scientific, technical, or specialized knowledge.
3. Whether Plaintiff's medical and mental-health records should be excluded for lack of foundation or hearsay.
4. Whether evidence concerning prison officials' personal relationships, prior complaints, incidents, disciplinary matters, or unrelated litigation is relevant or admissible character evidence.
5. Whether evidence of settlement negotiations, prior summary-judgment proceedings, dismissed claims, qualified immunity, and untimely disclosed declarations may be presented to the jury.

HOLDINGS

1. Plaintiff's conviction may be used for impeachment under Federal Rule of Evidence 609, but the evidence must be limited to the fact that he was convicted of a crime punishable by more than one year of imprisonment and is currently serving a sentence for that conviction; the nature of the crime, sentence length, and conviction date may not be introduced.
2. Plaintiff may testify about his personal experiences, including what he felt and observed regarding his medical needs or condition, but may not offer opinions requiring scientific, technical, or other specialized knowledge.
3. Evidence or questioning concerning prison officials' marital status, family status, or personal relationships outside the prison setting is excluded as irrelevant to Plaintiff's claim and Defendants' defenses.
4. Evidence concerning unrelated prior complaints, incidents, disciplinary matters, or litigation involving a prison official is excluded for purposes other than impeachment; the court reserved ruling on whether particular evidence may be used for impeachment at trial.
5. Plaintiff may not introduce offers, compromises, or statements made during settlement negotiations to prove or disprove liability or the amount of a disputed claim, or for impeachment by prior inconsistent statement or contradiction, absent a showing that the evidence is offered for a permissible purpose under Rule 408(b).
6. Qualified immunity is a legal issue for the judge, not the jury, and Plaintiff may not argue that issue to the jury.
7. Plaintiff may not introduce any declaration that was not timely disclosed by the court's August 22, 2025 deadline; objections to the declarations of Ms. Takehara and Dr. Feinberg were reserved for trial.

KEY QUOTATIONS

“A motion in limine is a procedural mechanism to limit in advance testimony or evidence in a particular area.” (at 2)

“Although the Federal Rules of Evidence do not explicitly authorize in limine rulings, the practice has developed pursuant to the district court’s inherent authority to manage the course of trials.” (at 3)

“qualified immunity “is a legal issue for the judge to decide”” (at 13)

FACTUAL BACKGROUND

Plaintiff is a state prisoner asserting that Defendants were deliberately indifferent to his serious medical needs in violation of the Eighth Amendment. The case was scheduled for a jury trial concerning the May 9, 2018 incident. The pretrial disputes concerned the admissibility and scope of evidence involving Plaintiff's murder conviction, prison disciplinary history, medical records, prison officials' personal relationships and prior conduct, settlement negotiations, prior litigation and summary-judgment proceedings, qualified immunity, and untimely disclosed declarations.

PROCEDURAL HISTORY

Plaintiff, a state prisoner proceeding pro se and in forma pauperis, brought an Eighth Amendment deliberate-indifference claim against prison officials. The case was set for jury trial, and both sides filed motions in limine. The court ruled on specified evidentiary requests and reserved ruling on other matters until trial.

DISPOSITION

other

CASES CITED

- United States v. Heller, 551 F.3d 1108, 1111 (9th Cir. 2009)
- City of Pomona v. SQM N. Am. Corp., 866 F.3d 1060, 1070 (9th Cir. 2017)
- Palmerin v. City of Riverside, 794 F.2d 1409, 1413 (9th Cir. 1986)
- Luce v. United States, 469 U.S. 38, 41 n.4 (1984)
- Vargas v. Lopez, No. 23-cv-02490-TSH, 2025 WL 2800196, at *1 (N.D. Cal. Sept. 30, 2025)
- U.S. v. Pac. Gas & Elec. Co., 178 F. Supp. 3d 927, 941 (N.D. Cal. 2016)
- Williams v. Castro, No. 20-cv-01617-SAB, 2023 WL 2432770, at *1 (E.D. Cal. Mar. 9, 2023)
- Jonasson v. Lutheran Child and Family Servs., 115 F.3d 436, 440 (7th Cir. 1997)
- Ohler v. United States, 529 U.S. 753, 758 n.3 (2000)
- United States v. Bensimon, 172 F.3d 1121, 1127 (9th Cir. 1999)
- Lane v. Beach, No. 20-cv-00147-JLT-GSA, 2023 WL 5183685, at *3 (E.D. Cal. Aug. 11, 2023)
- Morales v. Fry, 873 F.3d 817, 824 (9th Cir. 2017)

