

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Williams v. Prudhel

Williams · No. 2:22-cv-2250 CKD P · Decided March 6, 2023

SUMMARY

The United States District Court for the Eastern District of California grants Bobby James Williams leave to proceed in forma pauperis but requires payment of the statutory filing fee. The court dismisses the complaint for failure to state a claim under 42 U.S.C. § 1983, while granting thirty days to file an amended complaint. The order also provides guidance concerning pleading requirements, defendant involvement, and Title II of the Americans with Disabilities Act.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Carolyn K. Delaney
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 6, 2023
DOCKET	2:22-cv-2250 CKD P
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner proceeding pro se filed a 42 U.S.C. § 1983 complaint and requested leave to proceed in forma pauperis. The district court granted in forma pauperis status, screened the complaint under 28 U.S.C. § 1915A, dismissed the complaint for failure to state a claim, and granted leave to amend.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915A; dismissal is required for claims that are frivolous or malicious, fail to state a claim, or seek monetary relief from an immune defendant. In assessing failure to state a claim, the court accepts well-pleaded allegations as true and construes the complaint in the plaintiff's favor, while requiring factual allegations sufficient to state a facially plausible claim.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order

TOPICS

prisoners rights

section 1983

ada / disability

pleadings

civil procedure

PRACTICE AREAS

prisoner civil rights

federal civil procedure

pleading sufficiency

Americans with Disabilities Act

QUESTIONS PRESENTED

1. Whether the complaint stated a claim for relief under federal law sufficient to survive mandatory screening under 28 U.S.C. § 1915A.
2. Whether the plaintiff's allegations adequately connected each defendant to an alleged constitutional deprivation under 42 U.S.C. § 1983.
3. What pleading requirements applied to any amended complaint, including the requirements for asserting a Title II ADA claim and filing a complete amended pleading.

HOLDINGS

1. The complaint failed to state a claim upon which relief could be granted and was subject to dismissal under 28 U.S.C. § 1915A.
2. Plaintiff was granted thirty days to file an amended complaint that complies with the Civil Rights Act, the Federal Rules of Civil Procedure, and the Local Rules of Practice.
3. To establish a Title II ADA violation, a plaintiff must allege that he is a qualified individual with a disability, was excluded from or discriminated against regarding a public entity's services, programs, or activities, and suffered that exclusion or discrimination because of the disability.

KEY QUOTATIONS

“The court is required to screen complaints brought by prisoners seeking relief against a governmental entity or officer or employee of a governmental entity.” (at 1)

“To establish a violation of Title II of the ADA, a plaintiff must show that (1) [he] is a qualified individual with a disability; (2) [he] was excluded from participation in or otherwise discriminated against with regard to a public entity’s services, programs, or activities; and (3) such exclusion or discrimination was by reason of [his] disability.” (at 2)

“Local Rule 220 requires that an amended complaint be complete in itself without reference to any prior pleading.” (at 3)

FACTUAL BACKGROUND

Bobby James Williams, a state prisoner proceeding without counsel, filed a complaint seeking relief under 42 U.S.C. § 1983 and asserted, among other claims, a violation of the Americans with Disabilities Act. The court found that the complaint was sometimes illegible, unclear, repetitive, and insufficiently specific regarding the involvement of each defendant and the alleged deprivation of constitutional rights. The court therefore concluded that the complaint failed to state a claim under federal law but permitted amendment.

PROCEDURAL HISTORY

Plaintiff filed a prisoner civil-rights complaint against Joshua Prudhel and other defendants and sought in forma pauperis status. The court granted the request, assessed the statutory filing fee, screened the complaint, and concluded that it failed to state a claim under federal law. The court dismissed the complaint without prejudice and allowed thirty days to file an amended complaint.

DISPOSITION

dismissed

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 325, 327 (1989)
- Franklin v. Murphy, 745 F.2d 1221, 1227-28 (9th Cir. 1984)
- 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)
- Ellis v. Cassidy, 625 F.2d 227 (9th Cir. 1980)
- Rizzo v. Goode, 423 U.S. 362 (1976)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Lovell v. Chandler, 303 F.3d 1039, 1052 (9th Cir. 2002)
- Pennsylvania Department of Corrections v. Yeskey, 524 U.S. 206, 208 (1998)
- Duvall v. County of Kitsap, 260 F.3d 1124, 1138 (9th Cir. 2001)
- Loux v. Rhay, 375 F.2d 55, 57 (9th Cir. 1967)