

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Mathis v. County of Siskiyou

Mathis · No. 2:22-cv-1378 KJM AC · Decided July 25, 2025

SUMMARY

The United States District Court for the Eastern District of California denied Marshall Edward Mikels’ motion, construed as a motion to quash a subpoena and referred as a discovery motion. The court found that Mikels did not identify cognizable relief or present a non-frivolous legal argument, and rejected the document’s sovereign-citizen-related assertions.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 25, 2025
DOCKET	2:22-cv-1378 KJM AC
DISPOSITION	other
PROCEDURAL POSTURE	Pro se nonparty Marshall Edward Mikels filed a document construed as a motion to quash a subpoena and, by referral, as a discovery-related motion.
PRECEDENTIAL VALUE	Nonprecedential district court order
PARTIES	Russell Mathis, et al. v. County of Siskiyou, et al.

TOPICS

discovery dispute civil procedure

PRACTICE AREAS

civil procedure discovery

QUESTIONS PRESENTED

- Whether Mikels's filing could be construed as a cognizable discovery-related motion or motion to quash a subpoena.

2. Whether the motion should be denied because it identified no relief the court could plausibly grant and presented only frivolous sovereign-citizen arguments.

HOLDINGS

1. The filing was noncognizable because Mikels did not identify any relief that the court could plausibly grant and did not appear to seek judicial relief.
2. Sovereign-citizen-style arguments provide no legal basis for relief, and a filing containing such arguments without a legal cause of action or nonfrivolous argument must be denied.

FACTUAL BACKGROUND

Marshall Edward Mikels, who was not mentioned in the operative complaint and whose connection to the case was unclear, filed a document purporting to stop the delivery or use of information concerning individuals allegedly connected with a subpoena. The document appeared to seek notification of individuals regarding the release of information or efforts to contact Mikels, rather than identifiable judicial relief. It also contained sovereign-citizen-style arguments and no cognizable legal cause of action.

PROCEDURAL HISTORY

Mikels first filed the document as a notice, and after refileing it, the Clerk construed it as a motion to quash a subpoena. The motion was referred to the magistrate judge as a discovery motion under Eastern District of California Local Rule 302(c)(1). The court denied it.

DISPOSITION

other

CASES CITED

- U.S. v. Ward, 182 F.3d 930, at *2 (9th Cir. 1999)