

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ransom v. Spinelli

No. 2:25-cv-0531 AC P, United States District Court for the Eastern District of California (April 2, 2025)

SUMMARY

The United States District Court for the Eastern District of California denied without prejudice a state prisoner’s motion for appointment of counsel in a § 1983 action. The court held that the plaintiff had not demonstrated exceptional circumstances, noting that indigence, limited legal knowledge, reading difficulties, and the need for discovery were common circumstances and that the case was temporarily stayed for early alternative dispute resolution.

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	April 2, 2025
DOCKET	2:25-cv-0531 AC P
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a state prisoner proceeding pro se in a 42 U.S.C. § 1983 action, moved for appointment of counsel.
STANDARD OF REVIEW	Abuse of discretion.
PRECEDENTIAL VALUE	unpublished

TOPICS

- section 1983
- prisoners rights
- civil rights
- civil procedure

PRACTICE AREAS

- civil rights
- prisoner litigation
- civil procedure

QUESTIONS PRESENTED

- Whether the plaintiff demonstrated exceptional circumstances warranting the court's request that an attorney voluntarily represent him in his § 1983 action.

HOLDINGS

1. A district court may request voluntary representation for an indigent prisoner in a § 1983 action only when exceptional circumstances exist, assessed by considering the plaintiff's likelihood of success on the merits and ability to articulate his claims pro se in light of the complexity of the legal issues. Plaintiff's indigence, limited legal knowledge, limited reading comprehension, asserted complexity, and need for discovery did not establish exceptional circumstances.

KEY QUOTATIONS

“When determining whether “exceptional circumstances” exist, the court must consider plaintiff’s likelihood of success on the merits as well as the ability of the plaintiff to articulate his claims pro se in light of the complexity of the legal issues involved.” (1)

“Accordingly, IT IS HEREBY ORDERED that plaintiffs motion for the appointment of counsel (ECF No. 22) is DENIED without prejudice.” (2)

FACTUAL BACKGROUND

Robert L. Ransom is a state prisoner proceeding pro se in a § 1983 action against K. Spinelli and other defendants. He sought appointment of counsel based on indigence, lack of legal knowledge, limited reading comprehension, the asserted complexity of the issues, and the need for assistance with discovery. The case had been referred to early ADR and temporarily stayed.

PROCEDURAL HISTORY

The action was pending in the Eastern District of California and had been referred to early alternative dispute resolution and temporarily stayed. Plaintiff moved for appointment of counsel; the court denied the motion without prejudice.

DISPOSITION

other

CASES CITED

- Mallard v. United States Dist. Court, 490 U.S. 296, 298 (1989)
- Terrell v. Brewer, 935 F.2d 1015, 1017 (9th Cir. 1991)
- Wood v. Housewright, 900 F.2d 1332, 1335-36 (9th Cir. 1990)
- Palmer v. Valdez, 560 F.3d 965, 970 (9th Cir. 2009)