

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Wright v. Deforest

Wright · No. 2:24-cv-0420 CSK P · Decided June 23, 2025

SUMMARY

The United States District Court for the Eastern District of California screened a state prisoner’s amended 42 U.S.C. § 1983 complaint. The court found potentially cognizable First and Eighth Amendment retaliation and conditions-of-confinement claims against several defendants, while dismissing or declining to proceed on official-capacity damages claims, certain Fourteenth Amendment, access-to-courts, equal-protection, defamation, and state-law claims, and unrelated claims against defendant C. Griffith. The court gave the plaintiff the option to proceed on the cognizable claims or file a second amended complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 23, 2025
DOCKET	2:24-cv-0420 CSK P
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a state prisoner’s amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss prisoner claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. On screening, the court accepts well-pleaded allegations as true and construes the complaint liberally, but conclusory allegations and legal conclusions do not suffice.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Athelstan A. Wright v. M. Deforest, A. Albrecht, D. Jodin, M. Murphy, R. St. Andre, C. Griffith

TOPICS

section 1983

prisoners rights

first amendment

civil rights

pleadings

PRACTICE AREAS

prisoner civil rights

constitutional law

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether the amended complaint stated potentially cognizable First Amendment retaliation and Eighth Amendment claims under § 1983.
2. Whether claims for money damages against defendants in their official capacities were barred by Eleventh Amendment immunity.
3. Whether the amended complaint stated Fourteenth Amendment, access-to-courts, equal protection, defamation, or state-law claims.
4. Whether claims against C. Griffith were improperly joined under Federal Rules of Civil Procedure 20 and 21.
5. Whether plaintiff should be granted leave to amend or an opportunity to proceed on the cognizable claims.

HOLDINGS

1. Claims for monetary damages against state officials sued in their official capacities are barred by the Eleventh Amendment absent waiver, while official-capacity claims for prospective injunctive relief and individual-capacity claims are not barred on that basis.
2. The amended complaint states potentially cognizable First Amendment retaliation claims against M. Deforest, A. Albrecht, and D. Jodin based on alleged false rules violation reports and other conduct undertaken in retaliation for plaintiff's grievances, and against D. Jodin, M. Murphy, and A. Albrecht based on alleged retaliatory conduct in September 2022.
3. The amended complaint states potentially cognizable Eighth Amendment claims against M. Deforest, A. Albrecht, and D. Jodin based on plaintiff's placement and retention in administrative segregation for ninety-seven days allegedly resulting from a false rules violation report, and against R. St. Andre based on alleged placement and retention in administrative segregation and failure to intervene.
4. Plaintiff failed to state separate Fourteenth Amendment or access-to-courts claims in claim one; those claims were dismissed with leave to amend.
5. Plaintiff failed to state an equal protection claim based on defendants searching only his cell, because he did not allege protected-class discrimination or intentional differential treatment lacking a rational relationship to a legitimate state purpose.
6. The alleged libel or defamation did not state a federal constitutional claim under § 1983, and the cited criminal and state-law provisions did not independently support the pleaded federal claims; the claims were dismissed without prejudice.

7. The claims against C. Griffith were unrelated to the claims against the other defendants and were improperly joined; they were dismissed without prejudice rather than severed because the allegations did not clearly state a cognizable claim.
8. Plaintiff was entitled to choose between proceeding on the potentially cognizable claims or filing a second amended complaint to attempt to cure the identified deficiencies.

KEY QUOTATIONS

“The allegations in the amended complaint are sufficient at least to state potentially cognizable claims as follows” (at 13-14)

“Claims for damages against the state, its agencies, or its officers for actions performed in their official capacities are barred under the Eleventh Amendment, unless the state waives its immunity.” (at 5)

“Unrelated claims against unrelated defendants belong in different suits” (at 10)

FACTUAL BACKGROUND

Plaintiff alleged that California prison officials authored or contributed to false rules violation reports and retaliated against him for filing administrative grievances. He alleged that the reports resulted in approximately ninety-seven days in administrative segregation and other restrictions, losses, and injuries. He also alleged improper searches, destruction or mishandling of property, defamation, due process and equal protection violations, and unrelated conduct by defendant C. Griffith involving a later rules violation report.

PROCEDURAL HISTORY

Plaintiff, a state prisoner proceeding pro se and in forma pauperis, filed an amended complaint under 42 U.S.C. § 1983. The court screened the pleading, found several First and Eighth Amendment claims potentially cognizable, dismissed other claims without prejudice or with leave to amend, dismissed unrelated claims against C. Griffith without prejudice, and gave plaintiff thirty days either to proceed on the cognizable claims or file a second amended complaint.

DISPOSITION

other

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)
- Lopez v. Smith, 203 F.3d 1122, 1130-31 (9th Cir. 2000)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Erickson v. Pardus, 551 U.S. 89, 93 (2007)

- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Davis v. Scherer, 468 U.S. 183 (1984)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Jones v. Williams, 297 F.3d 930, 934 (9th Cir. 2002)
- Hansen v. Black, 885 F.2d 642, 646 (9th Cir. 1989)
- Johnson v. Duffy, 588 F.2d 740, 743-44 (9th Cir. 1978)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Starr v. Baca, 652 F.3d 1202, 1208 (9th Cir. 2011)
- Kentucky v. Graham, 473 U.S. 159, 169 (1985)
- Quern v. Jordan, 440 U.S. 332, 344-45 (1979)
- Hafer v. Melo, 502 U.S. 21, 30 (1991)
- Albright v. Oliver, 510 U.S. 266, 273 (1994)
- Lewis v. Casey, 518 U.S. 343, 346, 348-49, 353-55 (1996)
- Bounds v. Smith, 430 U.S. 817, 821 (1977)
- Alvarez v. Hill, 518 F.3d 1152, 1155 n.1 (9th Cir. 2008)
- City of Cleburne v. Cleburne Living Center, 473 U.S. 432, 439 (1985)
- Plyler v. Doe, 457 U.S. 202, 216 (1982)
- Hartmann v. California Department of Corrections & Rehabilitation, 707 F.3d 1114, 1123 (9th Cir. 2013)
- Taylor v. Delatoore, 281 F.3d 844, 849 (9th Cir. 2002)
- Engquist v. Oregon Department of Agriculture, 553 U.S. 591, 601-02 (2008)
- Village of Willowbrook v. Olech, 528 U.S. 562, 564 (2000)
- Lazy Y Ranch Ltd. v. Behrens, 546 F.3d 580, 592 (9th Cir. 2008)
- North Pacifica LLC v. City of Pacifica, 526 F.3d 478, 486 (9th Cir. 2008)
- Paul v. Davis, 424 U.S. 693, 699-701 (1976)
- Hernandez v. Johnson, 833 F.2d 1316, 1319 (9th Cir. 1987)
- Allen v. Gold Country Casino, 464 F.3d 1044, 1048 (9th Cir. 2006)
- Sweaney v. Ada County, 119 F.3d 1385, 1391 (9th Cir. 1997)
- Lovell v. Poway Unified School District, 90 F.3d 367, 370 (9th Cir. 1996)
- Nurre v. Whitehead, 580 F.3d 1087, 1092 (9th Cir. 2009)
- Rush v. Sport Chalet, Inc., 779 F.3d 973, 975 (9th Cir. 2015)
- DirecTV, Inc. v. Leto, 467 F.3d 842, 846-47 (3d Cir. 2006)
- Jones v. Blanas, 393 F.3d 918, 927 (9th Cir. 2004)
- Maldonado v. Harris, 370 F.3d 945, 954-55 (9th Cir. 2004)
- Cato v. Darst, 2019 WL 2249636, at *2 (E.D. Cal. May 23, 2019)
- Coleman v. 232 F.3d 1271, 1297 (9th Cir. 2000)
- United States v. Basher, 629 F.3d 1161, 1165 (9th Cir. 2011)
- Foley v. Martz, 2018 WL 5111998, at *1 (S.D. Cal. Oct. 19, 2018)

- Ramirez v. County of San Bernardino, 806 F.3d 1002, 1008 (9th Cir. 2015)

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