

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Wyatt v. County of Stanislaus

Wyatt · No. 1:21-cv-00455-DAD-JDP · Decided March 11, 2025

SUMMARY

The United States District Court for the Eastern District of California denied defendants’ motion for judgment on the pleadings in an action alleging that county officials unlawfully removed and separated plaintiffs’ children in violation of the Fourteenth Amendment right to familial association. The court held that although the children had an interest relating to the action, their interests were adequately represented by the plaintiffs and their absence would not expose defendants to multiple or inconsistent obligations under Federal Rule of Civil Procedure 19. Plaintiffs’ pending motion for summary judgment remained unresolved.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dale A. Drozd
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 11, 2025
DOCKET	1:21-cv-00455-DAD-JDP
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for judgment on the pleadings, arguing that plaintiffs' minor children were required parties under Federal Rule of Civil Procedure 19. The court denied the motion.
STANDARD OF REVIEW	Under Rule 19, the court conducts three successive, practical, and fact-specific inquiries: whether the absent party is necessary, whether joinder is feasible, and, if joinder is not feasible, whether the action may proceed or must be dismissed. The moving party bears the burden of persuasion, and evidence outside the pleadings may be considered on a Rule 12(b)(7) motion.
PRECEDENTIAL VALUE	Unknown

PARTIES

Emmanuel Wyatt, Makeda Wyatt v. County of Stanislaus, Diana Torres, Araceli Figueroa, Jones, Denise Aguilar, Julie Bartlett, Claudia Llamas

TOPICS

joinder

motion for judgment on the pleadings

civil procedure

civil rights

due process

PRACTICE AREAS

civil procedure

civil rights

constitutional law

family law

QUESTIONS PRESENTED

1. Whether plaintiffs' minor children were required parties under Federal Rule of Civil Procedure 19(a)(1) (B) because they had an interest relating to the action that could be impaired by proceeding in their absence.
2. Whether the children's absence would impair or impede their interests because plaintiffs could not adequately represent those interests.
3. Whether proceeding without the children would expose defendants to a substantial risk of double, multiple, or otherwise inconsistent obligations.
4. Whether defendants' belated Rule 19(a)(1)(A) argument that complete relief could not be accorded in the children's absence should be considered.

HOLDINGS

1. The children had an interest relating to the action because a finding that exigent circumstances justified their removal could have preclusive effect in a future action brought by the children arising from the removal.
2. The children's absence would not impair or impede their interests because plaintiffs adequately represented the children's only relevant interest in preserving potential future claims arising from the removal.
3. Proceeding without the children would not subject defendants to a substantial risk of double, multiple, or otherwise inconsistent obligations because the plaintiffs sought damages for their own injuries and any future claims by the children would concern distinct injuries.
4. The court declined to address defendants' argument that complete relief could not be accorded in the children's absence because defendants raised it for the first time in their reply brief.

KEY QUOTATIONS

“The inquiry is a practical one and fact specific, and is designed to avoid the harsh results of rigid application.” (at 10)

“Given that the absent children’s only interest in the pending action is shared with plaintiffs, plaintiffs would appear to be in a position to adequately represent the absent children’s interest.” (at 12)

“Inconsistent obligations occur when a party is unable to comply with one court’s order without breaching another court’s order concerning the same incident.” (at 14)

“Therefore, the absent children are not necessary parties, and they need not be joined.” (at 16)

FACTUAL BACKGROUND

Plaintiffs are the parents of seven minor children. Social workers entered plaintiffs' home pursuant to a search warrant on April 8, 2019, but allegedly removed all seven children without a warrant, exigent circumstances, or parental consent. A juvenile court later assumed jurisdiction and ordered the children returned while permitting continued governmental oversight. Plaintiffs allege emotional and physical harms and assert Fourteenth Amendment familial-association claims against individual defendants and the County of Stanislaus.

PROCEDURAL HISTORY

Plaintiffs filed an action under 42 U.S.C. § 1983 alleging violations of their Fourteenth Amendment right to familial association arising from the removal and continued separation of their seven children. Defendants moved for judgment on the pleadings based on the asserted failure to join the children. After briefing and submission on the papers, the court denied the motion and left plaintiffs' separate motion for summary judgment pending.

DISPOSITION

other

CASES CITED

- Equal Employment Opportunity Commission v. Peabody Western Coal Co., 400 F.3d 774, 779 (9th Cir. 2005)
- Makah Indian Tribe v. Verity, 910 F.2d 555, 558 (9th Cir. 1990)
- McShan v. Sherrill, 283 F.2d 462, 464 (9th Cir. 1960)
- Aguilar v. Los Angeles County, 751 F.2d 1089, 1094 (9th Cir. 1985)
- Washington v. Daley, 173 F.3d 1158, 1167 (9th Cir. 1999)
- Maverick Gaming LLC v. United States, 123 F.4th 960, 973 (9th Cir. 2024)
- Estate of Mendez v. City of Ceres, 390 F. Supp. 3d 1189, 1202 (E.D. Cal. 2019)
- Rogers v. County of San Joaquin, 487 F.3d 1288, 1294 (9th Cir. 2007)
- Moss v. Gates, No. 00-cv-07164-GAF-AJW, 2001 WL 1403045, at *2 (C.D. Cal. Nov. 6, 2001)
- A.H. v. Sacramento County Department of Child, Family & Adult Services, No. 2:21-cv-00690-KJM-JDP, 2021 WL 4263317, at *2 (E.D. Cal. Sept. 20, 2021)
- A.A. v. County of Riverside, No. 14-cv-02556-VAP-KK, 2015 WL 13817621, at *2 (C.D. Cal. Mar. 10, 2015)

- Kulya v. City & County of San Francisco, No. 06-cv-06539-JSW, 2007 WL 760776, at *2 (N.D. Cal. Mar. 10, 2007)
- Lennar Mare Island, LLC v. Steadfast Insurance Co., 139 F. Supp. 3d 1141, 1154 (E.D. Cal. 2015)
- Henry v. Rizzolo, No. 2:08-cv-00635-PMP, 2011 WL 2975539, at *4 (D. Nev. July 21, 2011)
- Cachil Dehe Band of Wintun Indians of the Colusa Indian Community v. California, 547 F.3d 962, 976 (9th Cir. 2008)
- Blumberg, 204 F.R.D. 453, 455
- Mangiaracina v. BNSF Railway Co., No. 16-cv-05270-JST, 2018 WL 368600, at *4 (N.D. Cal. Jan. 11, 2018)
- Zamani v. Carnes, 491 F.3d 990, 997 (9th Cir. 2007)
- North Coast Rivers Alliance v. United States Department of the Interior, No. 1:16-cv-00307-DAD-SKO, 2021 WL 5054394, at *5 (E.D. Cal. Nov. 1, 2021)
- In re Desiree B., 8 Cal. App. 4th 286, 293 (1992)
- In re Katherine A., No. B309881, 2021 WL 5294996, at *5-*6 (Cal. Ct. App. Nov. 15, 2021)
- In re Benjamin D., 227 Cal. App. 3d 1464, 1470 (1991)

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