

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sanjiv Kakkar v. Christopher Chestnut, et al.

Kakkar v. Chestnut · No. 1:25-cv-01627-JLT-SAB-HC · Decided December 16, 2025

SUMMARY

The United States District Court for the Eastern District of California ordered attorney Christine Raymond to show cause why her application for admission to practice pro hac vice should not be denied. The court questioned whether her residence, employment, and professional activities in California complied with Local Rule 180(b)(2), and allowed seven days for a written response.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Stanley A. Boone
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 16, 2025
DOCKET	1:25-cv-01627-JLT-SAB-HC
DISPOSITION	other
PROCEDURAL POSTURE	The court reviewed Christine Raymond's application for admission to practice pro hac vice on behalf of the petitioner and ordered her to show cause why the application should not be denied.
STANDARD OF REVIEW	The court exercised discretion under Local Rule 180(b)(2) in reviewing the pro hac vice application.
PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value.
PARTIES	Sanjiv Kakkar v. Christopher Chestnut, et al.

TOPICS

civil procedure

PRACTICE AREAS

Civil procedure Legal ethics and attorney admission

QUESTIONS PRESENTED

1. Whether the information in Christine Raymond's pro hac vice application warranted requiring her to show cause why the application should not be denied under Local Rule 180(b)(2).
2. Whether Raymond's California residence and employment suggested that she was ineligible for pro hac vice admission because she regularly resided, worked, or engaged in professional activities in California.

HOLDINGS

1. The court may require a pro hac vice applicant to explain potential noncompliance with Local Rule 180(b)(2) before deciding whether to grant or deny the application.

KEY QUOTATIONS

“The right to appear pro hac vice is not absolute and a court may deny the application by setting forth reasons for the denial.” (at 2)

“Unless authorized by the Constitution of the United States or an Act of Congress, an attorney is not eligible to practice pursuant to (b)(2) if any one or more of the following apply: (i) the attorney resides in California, (ii) the attorney is regularly employed in California, or (iii) the attorney is regularly engaged in professional activities in California.” (at 1)

FACTUAL BACKGROUND

Christine Raymond applied for admission to practice pro hac vice in the Eastern District of California. The application disclosed that she resided in San Francisco, California, and that her law firm was located there. It also identified four other pro hac vice applications she had submitted in the district during the preceding year, suggesting regular employment and regular professional activity in California.

PROCEDURAL HISTORY

Petitioner initiated a federal habeas corpus proceeding. Petitioner's attorney, Christine Raymond, filed an application for admission to practice pro hac vice. The district court identified potential noncompliance with Local Rule 180(b)(2) and ordered Raymond to provide a written explanation within seven days.

DISPOSITION

other

CASES CITED

- Frazier v. Heebe, 482 U.S. 641, 647 (1987)
- United States v. Ries, 100 F.3d 1469, 1471-72 (9th Cir.)
- Winterrowd v. Am. Gen. Annuity Ins. Co., 556 F.3d 815, 825 (9th Cir.)
- Phong Phan v. Becerra, No. 2:25-cv-01757-DC-JDP
- Quoc Hoac v. Becerra, No. 2:25-cv-01740-DC-JDP
- Yang v. Kaiser, No. 2:25-cv-02205-DAD-AC

- Zheng v. Albarran, No. 1:25-cv-01685-DJC-CKD

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF
CALIFORNIA 10 11 SANJIV KAKKAR, Case No. 1:25-cv-01627-JLT-SAB-HC 12 Petitioner,
ORDER REQUIRING CHRISTINE RAYMOND TO SHOW CAUSE WHY PRO 13 v. HAC
VICE APPLICATION SHOULD NOT BE DENIED 14 CHRISTOPHER CHESTNUT, et al.,
(ECF No. 9) 15 Respondents. 16 17 The Court has read and considered the application of
Christine Raymond, attorney for 18 Petitioner, for admission to practice pro hac vice under the
provisions of Rule 180(b)(2) of the 19 Local Rules of Practice of the United States District Court
for this District (“Local Rules” or 20 “L.R.”).

(ECF No. 9.) 21 Local Rule 180 provides in pertinent part: 22 Attorneys Pro Hac Vice. An
attorney who is a member in good standing of, and eligible to practice before, the Bar of any
United States Court or of the highest 23 Court of any State, or of any Territory or Insular
Possession of the United States, and who has been retained to appear in this Court may, upon
application and in 24 the discretion of the Court, be permitted to appear and participate in a
particular case.

Unless authorized by the Constitution of the United States or an Act of 25 Congress, an attorney is
not eligible to practice pursuant to (b)(2) if any one or more of the following apply: (i) the attorney
resides in California, (ii) the attorney 26 is regularly employed in California, or (iii) the attorney is
regularly engaged in professional activities in California.

27 L.R. 180(b)(2). 1 The Supreme Court has described pro hac vice attorneys as one time or
occasional 2 | practitioners. *Frazier v. Heebe*, 482 U.S. 641, 647 (1987). The right to appear pro
hac vice is not 3 | absolute and a court may deny the application by setting forth reasons for the
denial. *United 4 | States v. Ries*, 100 F.3d 1469, 1471-72 (9th Cir. 1996).

In addressing whether an attorney has 5 | been regularly practicing in California, the Ninth Circuit
considered whether the attorney 6 | physically appeared before the district court, signed pleadings,
and had contact with the 7 | plaintiffs, whether an attorney licensed in California remained the sole
attorney responsible to 8 | the plaintiff, and whether the attorney rendered legal advice to the
client.

Winterrowd v. Am. 9 | Gen. Annuity Ins. Co., 556 F.3d 815, 825 (9th Cir. 2009). 10 Ms. Raymond
lists four other cases in which she has made an application to be admitted 11 | to practice pro hac
vice in this District in the past year: *Phong Phan v. Becerra*, No. 2:25-cv- 12 | 01757-DC-JDP
(application granted June 26, 2025); *Quoc Hoac v. Becerra*, 2:25-cv-01740-DC- 13 | JDP
(application granted June 26, 2025); *Yang v. Kaiser*, 2:25-cv-02205-DAD-AC (application 14 |

granted August 8, 2025); Zheng v. Albarran, 1:25-cv-01685-DJC-CKD (application granted 15 | December 2, 2025).

The application states that Ms. Raymond resides in San Francisco, 16 | California, and her law firm is located in San Francisco, which suggests regular employment in 17 | California and regular engagement in professional activities in California. 18 Accordingly, IT IS HEREBY ORDERED that within SEVEN (7) days of the date of 19 | service of this order, Christine Raymond SHALL SHOW CAUSE in writing why her pro hac 20 | vice application should not be denied for failure to comply with Local Rule 180(b)(2).

21 IT IS SO ORDERED. F- 2 Se 23 | Dated: _December 16, 2025 _ ef STANLEY A. BOONE 24
United States Magistrate Judge 25 26 27 28