

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PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value.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

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