

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Robert Curtis Williams, III v. Castro, et al.

Williams v. Castro · No. 1:20-cv-01617-SAB (PC) · Decided March 9, 2023

SUMMARY

The United States District Court for the Eastern District of California ruled on defendants’ motions in limine in a 42 U.S.C. § 1983 action involving alleged death threats, failure to protect, and equal protection violations. The court granted or reserved ruling on motions concerning alleged correctional-officer codes of silence, medical evidence, prior bad acts, personnel records, punitive-damages bifurcation, and numerous plaintiff exhibits. The order is dated March 8, 2023.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 9, 2023
DOCKET	1:20-cv-01617-SAB (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving Defendants' initial and supplemental motions in limine in a pending 42 U.S.C. § 1983 prisoner civil-rights action.
STANDARD OF REVIEW	The court evaluated the proposed evidence under the Federal Rules of Evidence, including relevance, prejudice, hearsay, personal knowledge, authentication, character evidence, and lay-opinion rules.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown

TOPICS

- motion in limine
- evidence
- hearsay
- relevance
- civil rights

PRACTICE AREAS

- civil procedure
- evidence
- prisoner civil rights

QUESTIONS PRESENTED

1. Whether evidence concerning an alleged correctional-officer code of silence, alliance, or green wall was relevant and admissible.
2. Whether Plaintiff, as a nonexpert witness, could offer opinions about medical conditions, injuries, causation, inmate searches, use of force, or prison operations.
3. Whether Plaintiff's medical and mental-health records and other proposed exhibits were admissible given hearsay, foundation, authentication, relevance, and prejudice concerns.
4. Whether evidence of prior bad acts and prison personnel records could be used to establish that Defendants acted in conformity with a character trait.
5. Whether evidence of Defendants' financial condition should be excluded from the initial phase of trial and punitive damages bifurcated.
6. Whether the proposed exhibits concerning the IEX program, a parole hearing, a prior incident, inmate appeals, declarations, letters, and other materials were admissible.

HOLDINGS

1. Evidence and argument concerning an alleged code of silence, alliance, green wall, cover-up, or conspiracy among correctional officers and inmates were excluded because Plaintiff had not identified evidence connecting such a purported practice to the specific officers or claims at issue. Plaintiff remained permitted to argue that witnesses were inconsistent, biased, or untruthful because of their relationships with Defendants.
2. Plaintiff could testify about what he personally observed and experienced as a result of the incident, but could not offer opinions, diagnoses, inferences, or causation testimony requiring scientific, technical, or specialized knowledge, including opinions about medical conditions, long-term effects, mental or emotional injuries, inmate searches, use of force, or prison operations.
3. Plaintiff's medical and mental-health records were excluded because the records contained out-of-court statements and opinions, Plaintiff lacked personal knowledge and an adequate foundation for third-party records, and medical opinions had to be introduced through an appropriate expert or other competent foundation.
4. Evidence of prior incidents or bad acts involving Defendants that had no connection to Plaintiff's claims could not be used to show that Defendants acted improperly or had a propensity to act similarly in this case. Any proposed impeachment use of personnel records or similar material required a proffer and ruling outside the jury's presence.
5. The trial was bifurcated as to the amount of punitive damages, if any, and evidence of Defendants' financial condition was excluded from the initial portion of trial because it was not relevant at that stage and presented Rule 403 concerns.

KEY QUOTATIONS

“A motion in limine is a procedural mechanism to limit in advance testimony or evidence in a particular area.” (at 1)

“Absent evidence, the Court agrees that Plaintiff may not suggest there was a cover up or conspiracy, with or without using language such as “code of silence.”” (at 2)

“The trial shall be bifurcated on the issue of the amount of punitive damages, if any.” (at 6)

FACTUAL BACKGROUND

The action concerns alleged death threats, failure to protect, and equal protection violations involving prison officials. Defendants sought to exclude or limit evidence concerning an alleged correctional-officer code of silence, Plaintiff's medical and mental-health conditions and records, prior bad acts, personnel records, punitive-damages evidence, and numerous proposed exhibits. The court addressed the admissibility of each category in advance of trial.

PROCEDURAL HISTORY

Plaintiff, proceeding pro se and in forma pauperis, brought claims against Castro-Mendoza and Reguero concerning death threats, failure to protect, and equal protection violations. Defendants filed initial motions in limine on December 12, 2022, and supplemental motions on February 21, 2023. Plaintiff did not oppose the motions. The court granted most motions, denied one without prejudice, and reserved several evidentiary issues for trial.

DISPOSITION

other

CASES CITED

- United States v. Heller, 551 F.3d 1108, 1111 (9th Cir. 2009)
- Luce v. United States, 469 U.S. 38, 40 n.2 (1984)
- Jonasson v. Lutheran Child & Family Services, 115 F.3d 436, 440 (7th Cir. 1997)
- Brodit v. Cambra, 350 F.3d 985, 1004-05 (9th Cir. 2003)
- Sperberg v. Goodyear Tire & Rubber Co., 519 F.2d 708, 712 (6th Cir. 1975)
- Sartori v. County of Los Angeles, 676 F. App'x 680, 683 (9th Cir. 2017)
- Baltimore v. Haggins, No. 1:10-cv-931-LJO-JLT (PC), 2013 WL 4676455, at *6 (E.D. Cal. Aug. 30, 2013)
- Engman v. City of Ontario, No. EDCV 10-284 CAS (PLAx), 2011 WL 2463178, at *4 (C.D. Cal. June 20, 2011)
- Farmer v. Brennan