

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Lanier v. Doerer

Lanier · No. 1:24-cv-01178 JLT GSA · Decided July 31, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations and dismissed Kareem Lanier’s civil rights action without prejudice. The court held that Lanier failed to exhaust available administrative remedies under the Prison Litigation Reform Act and did not establish that the remedies remained unavailable after the prison lockdown ended. The Clerk of Court was directed to close the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jennifer L. Thurston
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 31, 2025
DOCKET	1:24-cv-01178 JLT GSA
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court conducted de novo review of a magistrate judge's findings and recommendations recommending dismissal of a prisoner civil-rights action for failure to exhaust administrative remedies. The plaintiff filed objections, but the court adopted the findings and recommendations and dismissed the action without prejudice.
STANDARD OF REVIEW	De novo review of the magistrate judge's findings and recommendations under 28 U.S.C. § 636(b)(1).
PRECEDENTIAL VALUE	Unknown; district court order identified as per curiam and not reported.
PARTIES	Kareem Lanier v. J. Doerer, the Government, Bureau of Prisons employees

TOPICS

- prisoners rights
- civil rights
- civil procedure

PRACTICE AREAS

prisoner civil rights

federal civil procedure

administrative exhaustion

QUESTIONS PRESENTED

1. Whether Lanier failed to exhaust available administrative remedies before filing his complaint and amended complaint.
2. Whether the alleged temporary unavailability of administrative remedies during the lockdown excused Lanier's failure to exhaust after the lockdown ended.
3. Whether the magistrate judge's findings and recommendations recommending dismissal should be adopted.

HOLDINGS

1. Lanier failed to comply with the Prison Litigation Reform Act's exhaustion requirement because he did not exhaust available administrative remedies before filing his complaint or amended complaint.
2. The action must be dismissed without prejudice for failure to exhaust administrative remedies.

KEY QUOTATIONS

“Plaintiff does not plead facts sufficient to establish an intentional and systematic obstruction to administrative remedies that, on its own, would render those remedies unavailable, and excuse his inability to exhaust them.” (at 3)

“The action is DISMISSED without prejudice, for failure to exhaust administrative remedies.” (at 4)

FACTUAL BACKGROUND

Lanier alleged that the Government and Bureau of Prisons employees violated his civil rights based on lockdown conditions at United States Penitentiary Atwater from August 9 to October 9, 2024. He claimed that he lacked access to administrative-remedy forms during the lockdown. However, he filed his complaint and amended complaint after the lockdown ended and did not explain why administrative remedies remained unavailable at that time.

PROCEDURAL HISTORY

Lanier brought claims concerning conditions during a lockdown at United States Penitentiary Atwater. The magistrate judge ordered him to show cause why the action should not be dismissed for failure to exhaust administrative remedies and found that he had not exhausted available remedies before filing his complaint or amended complaint. After Lanier objected, the district court performed de novo review under 28 U.S.C. § 636(b) (1), adopted the findings and recommendations, dismissed the action without prejudice, and directed the clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Talley v. Clark, 111 F.4th 255, 264 (3d Cir. 2024)
- Roman v. Knowles, 2011 WL 3741012, at *7 (S.D. Cal. June 20, 2011)

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