

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Anderson Purnell Thurston v. Babb, et al.

Thurston v. Babb · No. 2:25-cv-1925-JDP (P) · Decided December 1, 2025

SUMMARY

The United States District Court for the Eastern District of California screened a pro se former county inmate’s complaint against Yuba County Sheriff’s Deputies Babb and Dutt. The court found cognizable Fourteenth Amendment conditions-of-confinement claims based on alleged inadequate ventilation and delayed assistance during transport, but held that the equal protection claim was insufficiently articulated. The plaintiff was permitted to proceed on the cognizable claims or file an amended complaint, and the court corrected a defendant’s name on the docket.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 1, 2025
DOCKET	2:25-cv-1925-JDP (P)
DISPOSITION	other
PROCEDURAL POSTURE	Screening order on a pro se former county inmate's civil-rights complaint brought against two Yuba County sheriff's deputies.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915(e); the complaint must satisfy Federal Rule of Civil Procedure 8(a)(2) and allege enough facts to state a plausible claim for relief.
PRECEDENTIAL VALUE	Unknown; district-court screening order with no reporter citation.

TOPICS

- prisoners rights
- section 1983
- due process
- equal protection
- pleadings

PRACTICE AREAS

- prisoner civil rights
- constitutional litigation
- federal civil procedure

QUESTIONS PRESENTED

1. Whether plaintiff's allegations that defendants exposed him to inadequate ventilation and delayed assistance during inmate transport stated a cognizable Fourteenth Amendment conditions-of-confinement claim.
2. Whether plaintiff's allegations of racially disrespectful remarks sufficiently stated an equal-protection claim under 42 U.S.C. § 1983.

HOLDINGS

1. Because plaintiff appeared to have been a pretrial detainee, his allegations that defendants subjected him to inadequate conditions during transport and failed to respond adequately to his asthma attack were sufficient to proceed past screening as a Fourteenth Amendment claim.
2. The equal-protection claim could not proceed as currently articulated because plaintiff did not allege facts showing that defendants acted with an intent or purpose to discriminate against him based on membership in a protected class.

KEY QUOTATIONS

“A complaint must contain a short and plain statement that plaintiff is entitled to relief, Fed. R. Civ. P. 8(a) (2), and provide “enough facts to state a claim to relief that is plausible on its face,”” (at 1)

“Given that plaintiff appears to have been a pretrial detainee at the time of the incident, these allegations are sufficient to state a Fourteenth Amendment claim for inadequate conditions of confinement.” (at 2)

“To state a claim under 42 U.S.C. § 1983 for a violation of the Equal Protection Clause of the Fourteenth Amendment a plaintiff must show that the defendants acted with an intent or purpose to discriminate against the plaintiff based upon membership in a protected class.” (at 2)

FACTUAL BACKGROUND

During transport from Sacramento County Jail to Yuba County Jail, plaintiff, who has asthma, was allegedly left in a poorly ventilated van with two other inmates. He claimed that he experienced an asthma attack, requested his rescue inhaler, lost consciousness, and received an allegedly delayed and inadequate response from defendants. Plaintiff also alleged that defendants made racially disrespectful sarcastic remarks, but did not identify the racial language used or the protected class involved.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging that defendants violated his Fourteenth Amendment rights through inadequate conditions of confinement and discriminatory conduct. The court screened the complaint under 28 U.S.C. § 1915(e), found the conditions-of-confinement claims cognizable, and concluded that the equal-protection claim was insufficiently pleaded. Plaintiff was permitted either to proceed on the cognizable claims or to delay service and file an amended complaint within thirty days.

DISPOSITION

other

CASES CITED

- Bell v. Wolfish, 441 U.S. 520, 535 (1979)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1067-68 (9th Cir. 2016)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Kobold v. Good Samaritan Reg'l Med. Ctr., 832 F.3d 1024, 1038 (9th Cir. 2016)
- Nagrampa v. MailCoups, Inc., 469 F.3d 1257, 1264 n.2 (9th Cir. 2006) (en banc)
- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Hayes v. Idaho Corr. Ctr., 849 F.3d 1204, 1208 (9th Cir. 2017)
- Bruns v. Nat'l Credit Union Admin., 122 F.3d 1251, 1257 (9th Cir. 1997)
- Ivey v. Bd. of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Barren v. Harrington, 152 F.3d 1193, 1194 (9th Cir. 1998)

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