

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Martin v. Knight

No. 1:22-cv-01582-KES-BAM (PC) (E.D. Cal. June 17, 2025) · No. 1:22-cv-01582-KES-BAM (PC) · Decided
June 17, 2025

SUMMARY

The document contains Findings and Recommendations from the United States District Court for the Eastern District of California in a prisoner civil-rights action under 42 U.S.C. § 1983. The magistrate judge recommends denying Defendant Knight’s motion for summary judgment based on failure to exhaust administrative remedies, finding that Defendant did not establish the absence of exhaustion, particularly because a potentially relevant health-care grievance was not investigated. The parties were given fourteen days to file objections.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 17, 2025
DOCKET	1:22-cv-01582-KES-BAM (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations on Defendant Knight's motion for summary judgment seeking dismissal for failure to exhaust administrative remedies in a prisoner civil-rights action.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. For exhaustion, the evidence is viewed in the light most favorable to the prisoner; if material facts are disputed, summary judgment should be denied and the district judge should determine the facts.
PRECEDENTIAL VALUE	Unknown; findings and recommendations in a district court prisoner civil-rights case
PARTIES	Omar Martin v. Knight

TOPICS

summary judgment

prisoners rights

section 1983

civil rights

affirmative defenses

PRACTICE AREAS

prisoner civil rights

civil procedure

administrative exhaustion

constitutional law

QUESTIONS PRESENTED

1. Whether Defendant Knight proved that Martin failed to exhaust available administrative remedies before filing the operative complaint.
2. Whether summary judgment was appropriate when the evidence did not establish what happened to, or whether Martin exhausted, the potentially relevant health-care appeal.

HOLDINGS

1. A defendant seeking summary judgment for failure to exhaust must prove both that an administrative remedy was available and that the prisoner did not exhaust it; the ultimate burden of proof remains with the defendant.
2. Summary judgment must be denied when the evidence, viewed in the light most favorable to the prisoner, does not establish failure to exhaust and leaves material exhaustion facts unresolved.
3. Under Ninth Circuit precedent, PLRA exhaustion is assessed based on the filing date of the operative complaint, and a prisoner may supplement a complaint with facts concerning exhaustion.

KEY QUOTATIONS

“The failure to exhaust is an affirmative defense, and the defendants bear the burden of raising and proving the absence of exhaustion.” (at 2)

“Whether SATF HC 20000590 was related to the April 10, 2020 incident, contained any references to Defendant Knight’s actions or inactions on that date, or was fully exhausted by Plaintiff, are all questions left unanswered by Defendant’s motion for summary judgment.” (at 8-9)

FACTUAL BACKGROUND

Martin, a California state prisoner, alleged that he slipped on water and falling debris while being hurriedly moved from one housing unit to another on April 10, 2020, seriously injuring his right hand and thumb. He alleged that Defendant Knight knew of the hazardous conditions, witnessed the injury, refused Martin’s request for emergency medical assistance, and ordered him to continue the move. Martin identified a non-health-care grievance concerning the incident that was rejected as untimely, but his deposition also identified a potentially relevant health-care appeal, SATF HC 20000590.

PROCEDURAL HISTORY

Martin filed a § 1983 action alleging that Defendant Knight was deliberately indifferent to his serious medical need after Martin injured his hand while moving housing units. Knight moved for summary judgment based on failure to exhaust administrative remedies. Martin did not oppose the motion. The magistrate judge previously

recommended dismissal for failure to prosecute and failure to obey a court order, but the assigned district judge declined to adopt that recommendation and referred the matter for further proceedings. The magistrate judge recommended denying the motion for summary judgment because Knight did not establish that Martin failed to exhaust, particularly because the motion did not address potentially relevant health-care appeals.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was ordered. The magistrate judge recommended that Defendant's motion for summary judgment for failure to exhaust be denied and advised the parties that they could file objections within fourteen days.

CASES CITED

- Woods v. Carey, 684 F.3d 934 (9th Cir. 2012)
- Rand v. Rowland, 154 F.3d 952, 957 (9th Cir. 1998)
- Klingele v. Eikenberry, 849 F.2d 409, 411-12 (9th Cir. 1988)
- Booth v. Churner, 532 U.S. 731, 741 (2001)
- Porter v. Nussle, 534 U.S. 516, 524, 532 (2002)
- Jones v. Bock, 549 U.S. 199, 211-12, 216, 223-24 (2007)
- Albino v. Baca, 747 F.3d 1162, 1166, 1172
- Williams v. Paramo, 775 F.3d 1182, 1191 (9th Cir. 2015)
- Wash. Mut. Inc. v. United States, 636 F.3d 1207, 1216 (9th Cir. 2011)
- Carmen v. S.F. Unified Sch. Dist., 237 F.3d 1026, 1031 (9th Cir. 2001)
- Simmons v. Navajo Cty., Ariz., 609 F.3d 1011, 1017 (9th Cir. 2010)
- Reyes v. Smith, 810 F.3d 654, 657 (9th Cir. 2016)
- Harvey v. Jordan, 605 F.3d 681, 683 (9th Cir. 2010)
- Saddozai v. Davis, 35 F.4th 705, 706, 708-09 (9th Cir. 2022)
- Jones v. Blanas, 393 F.3d 918, 923 (9th Cir. 2004)
- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)