

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ronnie Stringfellow v. Silva, et al.

Stringfellow v. Silva · No. 1:24-cv-01461-BAM (PC) · Decided December 2, 2025

SUMMARY

The United States District Court for the Eastern District of California screens Ronnie Stringfellow’s 42 U.S.C. § 1983 complaint alleging excessive force by correctional officers. The court finds cognizable Eighth Amendment excessive-force claims against E. Prieto and S. Silva arising from specified uses of force, but recommends dismissal of the remaining claims and defendants. The magistrate judge directs random assignment of a district judge and allows fourteen days for 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	December 2, 2025
DOCKET	1:24-cv-01461-BAM (PC)
DISPOSITION	other
PROCEDURAL POSTURE	Pro se state prisoner brought a 42 U.S.C. § 1983 action in forma pauperis. On screening under 28 U.S.C. § 1915A, the magistrate judge recommended allowing limited Eighth Amendment excessive-force claims against correctional officers E. Prieto and S. Silva to proceed and dismissing all other claims and defendants.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915A; the court assessed whether the complaint was frivolous or malicious, failed to state a claim upon which relief may be granted, or sought monetary relief from an immune defendant. The pleading was evaluated under Federal Rule of Civil Procedure 8 and the facial-plausibility standard from Ashcroft v. Iqbal and Bell Atlantic Corp. v. Twombly, with factual allegations accepted as true but conclusory allegations and unwarranted inferences disregarded.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

section 1983

prisoners rights

cruel and unusual punishment

civil rights

pleadings

PRACTICE AREAS

civil rights litigation

prisoner civil rights

constitutional torts

federal pleading and screening

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible claim under 42 U.S.C. § 1983 for Eighth Amendment excessive force against Prieto and Silva.
2. Whether the allegations concerning the initial earring removal, hood, alleged smothering, initial triangle restraint, and tight handcuffing stated cognizable excessive-force claims.
3. Whether the complaint stated claims against Diaz and the Doe warden when it did not link either defendant to specific constitutional misconduct.
4. Whether supervisory-liability and respondeat-superior theories supported claims against the warden or other supervisory personnel.
5. Whether the unidentified Doe defendant could remain in the action without being identified and served.

HOLDINGS

1. The complaint plausibly stated excessive-force claims against Prieto and Silva for the force used from slamming Plaintiff to the ground until his facial implant was dislodged, for the later face-first slam and body-weight restraint that restricted his breathing, and for using the triangle restraint to pull him backward from a prone position, allegedly dislocating his shoulder or arm and cutting his wrist.
2. The complaint did not state cognizable excessive-force claims based on the earring removal, placement of the hood, alleged smothering, or initial placement of the triangle restraint.
3. The complaint did not state a cognizable excessive-force claim based solely on tight handcuffing.
4. The complaint failed to state claims against Diaz and the Doe warden because Plaintiff did not link either defendant to a constitutional deprivation, and supervisory liability could not rest solely on respondeat superior.

KEY QUOTATIONS

“whenever prison officials stand accused of using excessive physical force in violation of the [Eighth Amendment], the core judicial inquiry is . . . whether force was applied in a good-faith effort to maintain or restore discipline, or maliciously and sadistically to cause harm.” (at 5)

“A supervisor may be liable only if (1) he or she is personally involved in the constitutional deprivation, or (2) there is a sufficient causal connection between the supervisor's wrongful conduct and the constitutional violation.” (at 4)

FACTUAL BACKGROUND

Plaintiff, a transgender state prisoner, alleged that correctional officers Prieto and Silva used force while escorting him at Kern Valley State Prison after instructing him to remove an earring. He alleged that officers slammed him to the ground, applied force to his back and neck, restricted his breathing, dislodged a facial implant, and later used a mechanical restraint to pull him from a prone position, causing shoulder and wrist injuries. He also alleged excessive force involving the earring, a hood, smothering, and tight handcuffs, and named an additional correctional officer and a Doe warden without linking them to specific misconduct.

PROCEDURAL HISTORY

Plaintiff filed his complaint on November 22, 2024. The court screened the complaint on October 30, 2025, found a cognizable excessive-force claim against Prieto and Silva, and granted Plaintiff an opportunity to amend or elect to proceed on those claims. Plaintiff elected to proceed only against Prieto and Silva. The magistrate judge then issued findings and recommendations, subject to objection and review by an assigned district judge.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 676-78 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-57 (2007)
- Doe I v. Wal-Mart Stores, Inc., 572 F.3d 677, 681 (9th Cir. 2009)
- Moss v. U.S. Secret Service, 572 F.3d 962, 969 (9th Cir. 2009)
- Monell v. Department of Social Services, 436 U.S. 658 (1978)
- Rizzo v. Goode, 423 U.S. 362 (1976)
- Simmons v. Navajo County, Arizona, 609 F.3d 1011, 1020-21 (9th Cir. 2010)
- Ewing v. City of Stockton, 588 F.3d 1218, 1235 (9th Cir. 2009)
- Jones v. Williams, 297 F.3d 930, 934 (9th Cir. 2002)
- Crowley v. Bannister, 734 F.3d 967, 977 (9th Cir. 2013)
- Lemire v. California Department of Corrections & Rehabilitation, 726 F.3d 1062, 1074-75 (9th Cir. 2013)
- Lacey v. Maricopa County, 693 F.3d 896, 915-16 (9th Cir. 2012) (en banc)
- Hansen v. Black, 885 F.2d 642, 646 (9th Cir. 1989)
- Morgan v. Morgensen, 465 F.3d 1041, 1045 (9th Cir. 2006)
- Hudson v. McMillian, 503 U.S. 1, 5-9 (1992)
- Farmer v. Brennan, 511 U.S. 825, 832-33 (1994)
- Whitley v. Albers, 475 U.S. 312, 321-22, 327 (1986)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Wall v. County of Orange, 364 F.3d 1107, 1112 (9th Cir. 2004)
- Reviere v. Phillips, No. 1:11-CV-0483 AWI DLB PC, 2014 WL 711002, at *6 (E.D. Cal. Feb. 21, 2014)
- Gillespie v. Civiletti, 629 F.2d 637, 642 (9th Cir. 1980)

- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)

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