

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Nieto v. Allison

Nieto · No. 24-cv-02628-JST · Decided August 29, 2025

SUMMARY

The United States District Court for the Northern District of California denied Michael Nieto’s request for a temporary restraining order or preliminary injunction concerning alleged interference with legal mail and strip searches at Valley State Prison. The court held that the requested relief lacked a sufficient nexus to the excessive-force and medical-care claims in the operative complaint and that Valley State Prison officials were not parties subject to an injunction under Federal Rule of Civil Procedure 65(d).

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Jon S. Tigar
JURISDICTION	United States District Court for the Northern District of California
DECIDED	August 29, 2025
DOCKET	24-cv-02628-JST
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a state prisoner proceeding under 42 U.S.C. § 1983, moved for a temporary restraining order or preliminary injunction concerning alleged interference with legal mail, access to the courts, and strip searches. The district court denied the request.
STANDARD OF REVIEW	The court applied the standards governing temporary restraining orders and preliminary injunctions, including the requirement that interim relief bear a sufficient nexus to the claims in the operative complaint and that an injunction bind only persons subject to Federal Rule of Civil Procedure 65(d).
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation.
PARTIES	Michael Nieto v. Kathleen Allison, Magallon, Nagma, Singh, Flores, Taylor, Aguilar

TOPICS

injunctions

prisoners rights

section 1983

civil rights

civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether plaintiff was entitled to temporary or preliminary injunctive relief based on alleged retaliation and interference with access to the courts when those allegations were different from the claims in the operative complaint.
2. Whether the court could enjoin Valley State Prison officials who were not parties to the action and were not shown to be acting in active concert or participation with the defendants.

HOLDINGS

1. A plaintiff is not entitled to temporary or preliminary injunctive relief when the alleged injury and requested relief lack a sufficient nexus to the claims asserted in the underlying complaint.
2. Under Federal Rule of Civil Procedure 65(d), an injunction may bind parties, their officers, agents, servants, employees, attorneys, and persons acting in active concert or participation with them; absent such a relationship, the court may not order nonparty prison officials to act or refrain from acting.

KEY QUOTATIONS

“there must be a relationship between the injury claimed in the motion for injunctive relief and the conduct asserted in the underlying complaint.” (at 1)

“The Court therefore cannot order Valley State Prison correctional officials to take action or refrain from taking action.” (at 2)

FACTUAL BACKGROUND

Nieto, an inmate housed at Valley State Prison, sued Correctional Training Facility officials under 42 U.S.C. § 1983, alleging excessive force and deliberate indifference to serious medical needs after pepper spray was used against him. His motion for injunctive relief instead sought orders concerning alleged interference with legal mail and access to the courts and strip searches by Valley State Prison officials. Those officials were not parties to the action, and the court found no indication that they acted in concert or participation with the named defendants.

PROCEDURAL HISTORY

Nieto filed a § 1983 action alleging that Correctional Training Facility officials used excessive force and failed to decontaminate him after pepper spray exposure. He then sought interim injunctive relief against Valley State Prison officials based on alleged retaliation, interference with access to the courts, and strip searches. The court denied the request and terminated ECF No. 21.

DISPOSITION

CASES CITED

- Pacific Radiation Oncology, LLC v. Queen's Medical Center, 810 F.3d 631, 633 (9th Cir. 2015)

OPINION

1 2 3 4 UNITED STATES DISTRICT COURT 5 NORTHERN DISTRICT OF CALIFORNIA 6 7
MICHAEL NIETO, Case No. 24-cv-02628-JST 8 Plaintiff, ORDER DENYING REQUEST FOR
9 v. INJUNCTIVE RELIEF 10 KATHLEEN ALLISON, et al., Re: ECF No. 21 Defendants. 11 12
13 Plaintiff, an inmate currently housed at Valley State Prison (“VSP”), has filed a pro se 14 action
pursuant to 42 U.S.C. § 1983 against certain Correctional Training Facility (“CTF”) 15
correctional officials, alleging that they used excessive force on him and refused to decontaminate
16 him after pepper spray was used on him, in violation of the Eighth Amendment.

See generally 17 ECF Nos. 1, 6. This order addresses Plaintiff’s request for a court order enjoining
Valley State 18 Prison officials from blocking his access to the court by interfering with or reading
his legal mail 19 and from requiring him to submit to strip searches in front of surveillance
cameras every time he 20 crosses work change for college, mental health treatment, R&R and
education.

ECF No. 21. The 21 Court DENIES the request for injunctive relief for the following reasons. 22
First, the injunctive relief request does not relate to the dispute being litigated. “[T]here 23 must be
a relationship between the injury claimed in the motion for injunctive relief and the 24 conduct
asserted in the underlying complaint. This requires a sufficient nexus between the claims 25 raised
in a motion for injunctive relief and the claims set forth in the underlying complaint itself.” 26
Pacific Radiation Oncology, LLC v. Queen’s Med.

Ctr., 810 F.3d 631, 633 (9th Cir. 2015). There 27 is a sufficient nexus if the interim order “would
grant ‘relief of the same character as that which 1 denied plaintiff's request for injunction to
prevent HIPAA violation, where plaintiff had not 2 asserted HIPAA violation claim).

The complaint alleges use of excessive force and deliberate 3 indifference to his serious medical
needs by CTF correctional officials. The request for injunctive 4 } relief alleges retaliation and
interference with Plaintiffs access to the courts by VSP correctional 5 || officials.

The issues raised in the motion for injunctive relief are different from the allegations in 6 || the
operative complaint and therefore are not the proper basis for interim relief. Pacific Radiation 7
Oncology, LLC., 810 F.3d at 633 (plaintiff is not entitled to injunctive relief based on claims not 8
|| pled in complaint because “court’s equitable power lies only over the merits of the case or 9 ||
controversy before it.”).

10 Second, Fed. R. Civ. P. 65(d) provides that an injunction is binding only on parties to the 11 action, their officers, agents, servants, employees and attorneys and those “in active concert or 12 || participation” with them. Fed. R. Civ. P. 65(d).

The defendants in this action are CTF 13 correctional officials Magallon, Nagma, Singh, Flores, and Taylor; and CTF LVN Aguilar. Valley 14 State Prison correctional officials are not parties to this action. There is no indication that VSP 3 15 prison officials are acting in active concert or participation with Defendants.

In this action, the 16 || Court does not have jurisdiction over Valley State Prison correctional officials. The Court 3 17 therefore cannot order Valley State Prison correctional officials to take action or refrain from 18 taking action. 19 For the foregoing reasons, the Court DENIES Plaintiff's request for a temporary 20 || restraining order or preliminary injunction.

21 This order terminates ECF No. 21. 22 IT IS SO ORDERED. 23 Dated: August 29, 2025. 24 JON S. TIGA 5 United States District Judge 26 27 28