

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Adam Jacobs v. County of Sacramento, et al.

Jacobs · No. 2:25-cv-2648-DAD-JDP (PS) · Decided December 3, 2025

SUMMARY

The court grants the pro se plaintiff leave to amend his complaint to remove all federal claims and orders the proposed amended complaint filed. The magistrate judge recommends granting the plaintiff’s motion to remand the remaining California-law claims to Sacramento County Superior Court and denies as moot the motion to file documents electronically.

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 3, 2025
DOCKET	2:25-cv-2648-DAD-JDP (PS)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff removed the action from Sacramento County Superior Court to federal court based on federal-question jurisdiction, then moved to amend the complaint to eliminate all federal claims and to remand the case. Defendants did not oppose either motion. The magistrate judge granted leave to amend and recommended remand to state court.
STANDARD OF REVIEW	Leave to amend is governed by the liberal standard of Federal Rule of Civil Procedure 15(a)(2). Removal jurisdiction is strictly construed against removal, with the removing party bearing the burden of establishing federal jurisdiction; doubts are resolved in favor of remand.
PRECEDENTIAL VALUE	unpublished

TOPICS

- motion to amend
- subject matter jurisdiction
- civil procedure
- civil rights
- health law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether plaintiff should be granted leave to amend the complaint to eliminate the federal claims.
2. Whether the action should be remanded to state court after the amended complaint eliminated the federal claims that supported removal.
3. Whether plaintiff's motion to file documents electronically should be denied as moot if the case is remanded.

HOLDINGS

1. Leave to amend was granted because Rule 15(a)(2) requires courts to freely give leave when justice so requires, and defendants did not oppose the motion.
2. The magistrate judge recommended that the action be remanded to Sacramento County Superior Court because the first amended complaint eliminated the federal claims and presented no federal question.

KEY QUOTATIONS

“Rule 15(a)(2) instructs courts to “freely give leave [to amend] when justice so requires.”” (at 1)

“The burden of establishing federal jurisdiction is on the party seeking removal, and the removal statute is strictly construed against removal jurisdiction.” (at 1)

“When an amendment [to the complaint] excises the federal-law claims that enabled removal, the federal court loses its supplemental jurisdiction over the related state-law claims. The case must therefore return to state court.” (at 2)

FACTUAL BACKGROUND

Plaintiff alleged that defendants violated his civil rights and California law by failing to provide adequate medical care. After defendants removed the case to federal court on the basis of federal-question jurisdiction, plaintiff filed a proposed first amended complaint eliminating all federal claims and asserting only California-law violations. Defendants did not oppose amendment or remand.

PROCEDURAL HISTORY

Plaintiff initially filed a civil-rights and California-law action in Sacramento County Superior Court. Defendants removed the action to the Eastern District of California under 28 U.S.C. §§ 1331 and 1441(c). Plaintiff moved to amend the complaint to eliminate the federal claims and moved to remand; the court granted leave to amend and recommended that the action be remanded because the amended complaint presented only state-law claims.

DISPOSITION

other

REMAND INSTRUCTIONS

The magistrate judge recommended that the case be remanded to the Superior Court of the State of California in and for the County of Sacramento. The recommendation was subject to objections filed within fourteen days and required consideration by the assigned district judge.

CASES CITED

- Arizona Students' Ass'n v. Arizona Bd. of Regents, 824 F.3d 858, 871 (9th Cir. 2016)
- C.F. v. Capistrano Unified Sch. Dist., 654 F.3d 975, 985 (9th Cir. 2011)
- Sonoma Cty. Ass'n of Retired Employees v. Sonoma Cty., 708 F.3d 1109, 1117 (9th Cir. 2013)
- Emrich v. Touche Ross & Co., 846 F.2d 1190, 1195 (9th Cir. 1988)
- Gaus v. Miles, Inc., 980 F.2d 564, 566 (9th Cir. 1992)
- Royal Canin U. S. A., Inc. v. Wulschleger, 604 U.S. 22, 25-26 (2025)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Yist, 951 F.2d 1153 (9th Cir. 1991)