

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Jennifer DeAngelis v. State of Missouri, et al.

DeAngelis · No. 4:25-cv-0895-MTS · Decided March 5, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri dismisses Jennifer DeAngelis’s action without prejudice. The court finds that she failed to file her complaint on the required form, properly sign her filings, comply with an order to amend, and update her mailing address.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Matthew T. Schelp
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	March 5, 2026
DOCKET	4:25-cv-0895-MTS
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court dismissed Plaintiff's civil action without prejudice after she failed to comply with an order requiring her to file an amended complaint on the Court's form and properly sign her filings, and after mail sent to her provided address was returned as undeliverable.
PRECEDENTIAL VALUE	Unknown; memorandum opinion from a federal district court
PARTIES	Jennifer DeAngelis v. State of Missouri, et al.

TOPICS

- pleadings
- civil procedure

PRACTICE AREAS

- civil procedure
- civil rights

QUESTIONS PRESENTED

1. Whether the action should be dismissed without prejudice when Plaintiff failed to comply with the Court's order to file an amended complaint on the required form and properly sign her filings.
2. Whether dismissal was appropriate when Plaintiff failed to update her address and Court mail was returned as undeliverable.

HOLDINGS

1. A plaintiff's action may be dismissed without prejudice when the plaintiff fails to comply with an order requiring correction of an improperly formatted and unsigned pleading, fails to seek additional time, and fails to update the address on file with the Court.

KEY QUOTATIONS

"Because Plaintiff failed to obey the Court's Order, has no properly signed pleading, and has failed to update her address, the Court will dismiss her action without prejudice." (2)

FACTUAL BACKGROUND

Plaintiff filed a complaint that was not on the Court's provided form and submitted filings that were not properly signed. The Court ordered her to correct those deficiencies by March 3, 2026, but she failed to do so and did not seek additional time. The Court's order was returned as undeliverable because Plaintiff had not maintained a current mailing address with the Court.

PROCEDURAL HISTORY

The Court previously ordered Plaintiff to file amended documents by March 3, 2026, to correct her failure to use the Court's provided complaint form and to properly sign her filings. Plaintiff did not comply, did not request additional time, and did not update her address after the Court's order was returned as undeliverable. The Court dismissed the action without prejudice and directed that an order of dismissal be entered under Federal Rule of Civil Procedure 58(a).

DISPOSITION

dismissed

CASES CITED

- Pack v. City of St. Charles, 4:25-cv-0911-MTS, 2025 WL 2549230, at *1 (E.D. Mo. Sept. 4, 2025)
- Shaffer v. Lashbrook, 962 F.3d 313, 317 (7th Cir. 2020)
- Brown v. Zarek, 162 F.3d 1172 (10th Cir. 1998) (per curiam) (table decision)
- Hall v. Gonfrade, 36 F.3d 1089 (1st Cir. 1994) (per curiam) (table decision)

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