

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Dequan Lynn Hall, by Next Friend Jerry Dwayne King Jr. v. City of
Detroit, a Municipal Corporation (plus John/Jane Doe Officers,
Detectives, Supervisors)

Hall v. City of Detroit · No. 2:26-cv-10023 · Decided January 8, 2026

SUMMARY

The court dismissed a civil rights complaint filed by Jerry Dwayne King Jr. as next friend of incarcerated plaintiff Dequan Lynn Hall against the City of Detroit and related defendants. The court held that King failed to establish Hall’s inaccessibility, incompetence, disability, or a sufficient relationship to support next-friend standing under Federal Rule of Civil Procedure 17(c) and *Whitmore v. Arkansas*.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	January 8, 2026
DOCKET	2:26-cv-10023
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court sua sponte dismissed a civil-rights complaint at the outset because the person who signed and filed it as Hall's next friend failed to establish next-friend standing.
STANDARD OF REVIEW	The court determined whether the complaint established next-friend standing and thereby justified the court's jurisdiction.
PRECEDENTIAL VALUE	Unknown

TOPICS

- standing
- civil rights
- section 1983
- prisoners rights
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether an incarcerated person may proceed through a next friend based solely on incarceration and limited access to legal materials.
2. Whether King established the prerequisites for next-friend standing by showing that Hall was unable to litigate independently and that King was dedicated to Hall's best interests and had a significant relationship with him.
3. Whether the complaint should be dismissed when the purported next friend lacks standing.

HOLDINGS

1. Incarceration, limited access to legal materials, or lack of legal knowledge does not by itself establish that a real party in interest is inaccessible or otherwise unable to litigate, and therefore does not establish next-friend standing.
2. King failed to establish next-friend standing because he did not demonstrate that Hall was unable to litigate on his own behalf and did not explain the significant relationship he claimed to have with Hall.
3. Because King lacked standing to file the action on Hall's behalf, the complaint and the cause of action were dismissed.

KEY QUOTATIONS

“Most important for present purposes, “next friend” standing is by no means granted automatically to whomever seeks to pursue an action on behalf of another.” (495 U.S. at 163-64 (quoted in opinion))

“The burden is on the “next friend” clearly to establish the propriety of his status and thereby justify the jurisdiction of the court.” (495 U.S. at 163-64 (quoted in opinion))

FACTUAL BACKGROUND

Hall was incarcerated, and Jerry Dwayne King Jr. attempted to file a civil-rights complaint on Hall's behalf as his next friend. The complaint alleged that Hall's incarceration limited his access to courts, legal materials, facts, documents, and litigation resources. It did not allege that Hall was a minor, mentally incompetent, or disabled, and it did not explain the nature of King's asserted significant relationship with Hall.

PROCEDURAL HISTORY

Jerry Dwayne King Jr. filed a civil-rights complaint on January 6, 2026, purporting to act solely as next friend for incarcerated plaintiff Dequan Lynn Hall. The complaint alleged that incarceration made Hall functionally unable to litigate, but did not allege that Hall was a minor, incompetent, or subject to a disability preventing him from prosecuting the action. The district court concluded that King lacked standing and dismissed the complaint and cause of action.

DISPOSITION

dismissed

CASES CITED

- Whitmore v. Arkansas, 495 U.S. 149, 163-64 (1990)
- Morgan v. Potter, 157 U.S. 195, 198 (1895)
- Nash ex rel. Hashimoto v. MacArthur, 184 F.2d 606, 607-08 (D.C. Cir. 1950), cert. denied, 342 U.S. 838 (1951)
- Wilson v. Lane, 870 F.2d 1250, 1253 (7th Cir. 1989)
- Smith ex rel. Missouri Public Defender Comm'n v. Armontrout, 812 F.2d 1050, 1053 (8th Cir. 1987), cert. denied, 483 U.S. 1033 (1987)
- Weber v. Garza, 570 F.2d 511, 513-14 (5th Cir. 1978)
- Morris v. United States, 399 F. Supp. 720, 722 (E.D. Va. 1975)
- Davis v. Austin, 492 F. Supp. 273, 275-76 (N.D. Ga. 1980)
- Groseclose ex rel. Harries v. Dutton, 594 F. Supp. 949, 952 (M.D. Tenn. 1984)
- Lucarelli v. United States, 65 F. App'x 926, 927 (6th Cir. 2003)
- Carpenter on behalf of Cardello-Smith v. King, No. 1:24-CV-465, 2024 WL 2349108, at *2 (W.D. Mich. May 23, 2024)
- Carpenter v. King, No. 24-1587, 2024 WL 5319080 (6th Cir. Dec. 5, 2024)
- Williamson v. Wakefield, No. 3:23-CV-P339, 2023 WL 7399128, at *2 (W.D. Ky. Oct. 3, 2023)
- Washington v. Neil, No. 1:18CV00589, 2019 WL 4743666, at *2 (S.D. Ohio Sept. 30, 2019)
- Pinkston v. Smith, No. 3:15cv786-CWR-MTP, 2015 WL 7289501, at *2 (S.D. Miss. Nov. 17, 2015)
- Drane v. Streck, No. 3:24-CV-00202, 2024 WL 4227033, at *2 (S.D. Ohio Sept. 18, 2024)
- Drane v. Streck, No. 3:24-CV-202, 2024 WL 4528937 (S.D. Ohio Oct. 18, 2024)