

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Garrett R. Reid v. Veterans Administration, Pittsburgh, PA

Reid · No. 2:22-CV-01025-CBB · Decided March 17, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania dismissed Garrett R. Reid’s pro se employment-discrimination action for failure to prosecute under Federal Rule of Civil Procedure 41(b). The court applied the Poulis factors and concluded that Reid’s failure to file an amended complaint or seek further relief, despite multiple extensions, warranted dismissal.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Christopher B. Brown
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	March 17, 2026
DOCKET	2:22-CV-01025-CBB
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court dismissed the pro se plaintiff's action under Federal Rule of Civil Procedure 41(b) for failure to prosecute after he failed to file an amended complaint or seek leave to amend by multiple court-ordered deadlines.
STANDARD OF REVIEW	A district court has discretion to dismiss an action for failure to prosecute under Federal Rule of Civil Procedure 41(b), applying the six Poulis factors: personal responsibility, prejudice, history of dilatoriness, willfulness or bad faith, effectiveness of alternative sanctions, and meritoriousness of the claim or defense.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- civil procedure
- motions to dismiss
- pleadings
- subject matter jurisdiction
- ada / disability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court could dismiss the action under Federal Rule of Civil Procedure 41(b) for Reid's failure to prosecute after he failed to comply with deadlines and orders requiring him to seek leave to amend.
2. Whether dismissal for failure to prosecute was warranted under the six-factor test established in *Poulis v. State Farm Fire and Casualty Company*.
3. Whether a pro se litigant may be dismissed for failure to prosecute notwithstanding his lack of formal legal training.

HOLDINGS

1. A federal district court may dismiss an action under Federal Rule of Civil Procedure 41(b) when a plaintiff fails to prosecute or comply with court rules or orders, including when the plaintiff is proceeding pro se.
2. Dismissal was warranted because the Poulis factors, considered together, weighed sufficiently in favor of dismissal, with four factors favoring dismissal and two factors neutral.

KEY QUOTATIONS

"A federal court has the discretion to dismiss a proceeding based on a party's failure to prosecute."
(Discussion)

"A district court has the power to dismiss a case pursuant to Fed. R. Civ. P. 41(b) for failure to prosecute even if the plaintiff is proceeding pro se." (Discussion)

"The Third Circuit laid out factors that a court must consider when determining whether a case should be dismissed for the plaintiff's failure to prosecute in Poulis v. State Farm Fire and Casualty Company, 747 F.2d 863, 868 (3d Cir. 1984)." (Discussion)

FACTUAL BACKGROUND

Reid alleged that the Veterans Administration failed to accommodate his traumatic brain injury after he returned from military service. After the court dismissed his claims and allowed him to amend, Reid did not file an amended complaint or seek leave to amend despite multiple extensions and explicit warnings. He had not communicated with the court for more than six months before the dismissal opinion.

PROCEDURAL HISTORY

Reid filed this civil action alleging employment discrimination and failure to accommodate a traumatic brain injury under the Rehabilitation Act, Title VII, the ADEA, the PHRA, and USERRA. The court granted the defendant's motion to dismiss or for summary judgment, dismissed the PHRA claim with prejudice, dismissed the other claims without prejudice, and granted leave to amend. After Reid failed to amend, the court granted additional extensions and warned that failure to respond would result in dismissal. Reid then failed to file a

motion for leave, an amended complaint, a request for extension, or other communication, so the court dismissed the case for failure to prosecute.

DISPOSITION

dismissed

CASES CITED

- Link v. Wabash R. Co., 370 U.S. 626, 629–30 (1962)
- Qadr v. Overmyer, 642 F. App'x 100, 102 (3d Cir. 2016)
- Jourdan v. Jabe, 951 F.2d 108, 109–10 (6th Cir. 1991)
- Poulis v. State Farm Fire and Casualty Company, 747 F.2d 863, 868 (3d Cir. 1984)
- Cravener v. McClister, No. 2:23-CV-00355, 2023 WL 7168929, at *3 (W.D. Pa. Oct. 9, 2023)
- Briscoe v. Klaus, 538 F.3d 252, 263 (3d Cir. 2008)
- Hicks v. Feeney, 850 F.2d 152, 156 (3d Cir. 1988)

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