UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

Sannah Dauda v. Valery Jean

Dauda v. Jean · No. 8:23-cv-00174-GLS · Decided March 10, 2026

SUMMARY

The United States District Court for the District of Maryland denied Defendant Valery Jean's motion for reconsideration under Federal Rule of Civil Procedure 59(e). The court held that the evidence regarding repayment of the promissory note was not newly discovered, that Defendant had not acted diligently, and that he failed to establish clear error or manifest injustice. The prior judgment awarding Plaintiff $100,000 in principal, $7,500 in interest, $10,360 in attorney's fees, and $547 in costs remained in effect.

CASE DETAILS

COURT	United States District Court for the District of Maryland, Southern Division
WRITING FOR THE COURT	Gina L. Simms
JURISDICTION	United States District Court for the District of Maryland, Southern Division
DECIDED	March 10, 2026
DOCKET	8:23-cv-00174-GLS
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 59(e) for reconsideration of the judgment awarding Plaintiff the unpaid principal and interest on a promissory note, as well as attorney's fees and costs.
STANDARD OF REVIEW	A Rule 59(e) motion is reviewed under a limited standard; the district court has broad discretion, and reconsideration is warranted only for an intervening change in controlling law, newly available evidence, or clear error of law or manifest injustice.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court memorandum opinion
PARTIES	Valery Jean v. Sannah Dauda

TOPICS

motion for reconsideration | civil procedure | breach of contract | contracts | attorney fees

PRACTICE AREAS

civil procedure | contracts | commercial litigation | remedies

QUESTIONS PRESENTED

1. Whether Defendant satisfied the grounds for reconsideration under Federal Rule of Civil Procedure 59(e) based on an intervening change in controlling law.
2. Whether Defendant was entitled to reconsideration based on newly discovered evidence.
3. Whether the judgment constituted clear error of law or resulted in manifest injustice because Defendant claimed to have repaid the principal and additional interest.
4. Whether the awards of attorney's fees and costs should be reconsidered.

HOLDINGS

1. A motion under Federal Rule of Civil Procedure 59(e) may be granted only to accommodate an intervening change in controlling law, account for new evidence not previously available, or correct a clear error of law or prevent manifest injustice.
2. A party seeking reconsideration based on newly discovered evidence must show that the evidence was newly discovered after judgment, that the party exercised due diligence, that the evidence is not merely cumulative or impeaching, that it is material, and that it would likely produce a different result or require amendment of the judgment.
3. A Rule 59(e) motion may not be used to relitigate old issues, raise arguments, or present evidence that could have been presented before judgment.
4. Mere disagreement with the Court's prior ruling does not establish clear error or manifest injustice sufficient to support Rule 59(e) relief.
5. The existing awards of $10,360 in attorney's fees and $547 in costs remained in effect because Defendant did not contest those awards.

KEY QUOTATIONS

> *"reconsideration of a judgment after its entry is an extraordinary remedy which should be used sparingly."* (Third Element: Clear Error of Law or Manifest Injustice)

> *"mere disagreement" with this Court's prior ruling "does not support a Rule 59(e) motion."* (Third Element: Clear Error of Law or Manifest Injustice)

> *"For the aforementioned reasons, ECF No. 59 is DENIED. The judgment entered in this case, ECF No. 58, remains in effect."* (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged that Defendant breached a promissory note by failing to repay $100,000. At summary judgment, Plaintiff submitted a declaration and bank records supporting her payment of the $100,000, while Defendant did not submit authenticated and admissible evidence sufficient to create a genuine dispute. After judgment, Defendant conceded that Plaintiff had paid him $100,000 and presented purported bank records and deposit receipts claiming that he had repaid the principal and paid additional interest, but the Court found the materials insufficiently reliable.

PROCEDURAL HISTORY

Plaintiff sued Defendant under diversity jurisdiction for breach of a promissory note and moved for summary judgment. The Court entered summary judgment for Plaintiff and ordered repayment of $100,000, later awarding $7,500 in interest, $10,360 in attorney's fees, and $547 in costs. Defendant moved for reconsideration twenty-eight days after judgment, relying on newly obtained bank records and arguments that he had repaid the principal and additional interest. The Court denied reconsideration and left the judgment in effect.

DISPOSITION

other

CASES CITED

- Gagliano v. Reliance Standard Life Ins. Co., 547 F.3d 230, 241 n. 8 (4th Cir. 2008)
- Zinkand v. Brown, 478 F.3d 634, 637 (4th Cir. 2007)
- Pacific Insurance Co. v. American National Fire Insurance Co., 148 F.3d 396, 402-03 (4th Cir. 1998)
- Russell v. Delco Remy Division of General Motors Corp., 51 F.3d 746, 749 (7th Cir. 1995)
- Boryan v. United States, 884 F.2d 767, 771 (4th Cir. 1989)
- Taylor v. Texgas Corp., 831 F.2d 255, 259 (11th Cir. 1987)
- Davis v. Maryland Parole Commission, Civ. No. ELH-21-3164, 2023 WL 2023193, at *1 (D. Md. Feb. 14, 2023)
- Matter of Reese, 91 F.3d 37, 39 (7th Cir. 1996)
- Wagner v. Warden, Civ. No. ELH 14-791, 2016 WL 1169937, at *3 (D. Md. Mar. 24, 2016)
- King v. McFadden, Civ. No. 14-091 JMC, 2015 WL 4937292, at *2 (D.S.C. Aug. 18, 2015)
- Hutchinson v. Staton, 994 F.2d 1076, 1082 (4th Cir. 1993)
- Pinney v. Nokia, Inc., 402 F.R.D. 430, 453 (4th Cir. 2005)
- Potter v. Potter, 199 F.R.D. 550, 553 (D. Md. 2001)
- TFWS, Inc. v. Franchot, 572 F.3d 186, 194 (4th Cir. 2009)
- Parts & Electric Motors v. Sterling Electric, 866 F.2d 228, 223 (7th Cir. 1988)
- Butler v. DirectSAT USA, LLC, 307 F.R.D. 445, 449 (D. Md. 2015)