

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Carlos Coldon v. Rutherford County Sheriff's Office, et al.

No. 3:24-cv-01320 (M.D. Tenn. Feb. 6, 2026) · No. 3:24-cv-01320 · Decided February 6, 2026

SUMMARY

The U.S. District Court for the Middle District of Tennessee granted Carlos Coldon leave to proceed in forma pauperis and conducted initial screening under the Prison Litigation Reform Act. The court dismissed the action for failure to state a claim, concluding that the allegations regarding the absence of wheelchair-accessible handrails did not support liability under 42 U.S.C. § 1983, the ADA, or the Rehabilitation Act. The court also denied the pending motion to appoint counsel as moot.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Ata L. Campbell
JURISDICTION	U.S. District Court for the Middle District of Tennessee, Nashville Division
DECIDED	February 6, 2026
DOCKET	3:24-cv-01320
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se incarcerated plaintiff filed an in forma pauperis civil-rights complaint under 42 U.S.C. § 1983, asserting Eighth Amendment, ADA Title II, and Rehabilitation Act claims. The district court granted leave to proceed in forma pauperis and conducted initial screening under the Prison Litigation Reform Act.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2) and 1915A, the court screened the complaint for frivolousness, maliciousness, failure to state a claim, and claims against immune defendants. Failure to state a claim was evaluated under the plausibility standard applicable to Federal Rule of Civil Procedure 12(b)(6), with well-pleaded factual allegations accepted as true, legal conclusions and unwarranted inferences disregarded, and the pro se complaint liberally construed.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order

TOPICS

section 1983

ada / disability

reasonable accommodation

prisoners rights

motions to dismiss

PRACTICE AREAS

civil rights

prisoners' rights

disability discrimination

constitutional litigation

federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint plausibly stated a Section 1983 claim against Rutherford County, the Rutherford County Sheriff's Office, Rudd Medical Service, or Lieutenant Davis based on the lack of handrails and alleged deliberate indifference.
2. Whether Coldon's request for injunctive relief was moot after his transfer from the Rutherford County Jail and subsequent release.
3. Whether the complaint plausibly stated an ADA Title II or Rehabilitation Act failure-to-accommodate claim against the Rutherford County Sheriff's Office.
4. Whether Lieutenant Davis could be held individually liable under Title II of the ADA or the Rehabilitation Act, and whether Rudd Medical Service was a public entity subject to Title II.

HOLDINGS

1. The Rutherford County Sheriff's Office is not a proper Section 1983 defendant, although the claim was liberally construed as one against Rutherford County. Neither Rutherford County nor Rudd Medical Service could be held liable because the complaint did not plausibly allege that a policy or custom was the moving force behind the alleged deprivation.
2. The complaint did not state a plausible Eighth Amendment damages claim against Davis because Coldon did not allege that he suffered an injury caused by Davis's refusal to install handrails.
3. The request for transfer was moot because Coldon was transferred from the Rutherford County Jail and later released from custody.
4. The complaint failed to state a plausible failure-to-accommodate claim against the Rutherford County Sheriff's Office under Title II of the ADA or Section 504 of the Rehabilitation Act because it did not allege denial of a reasonable accommodation pursuant to a county policy, regulation, or other ruling because of disability.
5. Lieutenant Davis could not be held individually liable for damages under Title II or the Rehabilitation Act, and Rudd Medical Service was not a public entity subject to Title II merely because it contracted with the county to provide inmate healthcare.

KEY QUOTATIONS

"To determine whether the Complaint states a claim upon which relief may be granted, the Court reviews for whether it alleges sufficient facts "to state a claim to relief that is plausible on its face," such that it would survive a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6)." (Section II.A)

“To prevail under this theory, a plaintiff must show that the defendant reasonably could have accommodated his disability but refused to do so,” (Section II.C.2)

FACTUAL BACKGROUND

Coldon, who was paralyzed and used a wheelchair, was housed at the Rutherford County Jail in a cell without handrails around his bed or toilet. After he reported special medical needs, Lieutenant P. Davis investigated and told him that the medical pod was ADA-compliant and that handrails would not be installed in his cell. Coldon filed and appealed a grievance, but he did not allege that he suffered an actual injury from the lack of handrails; he was later transferred to state custody and released.

PROCEDURAL HISTORY

Carlos Coldon filed the complaint on November 5, 2024, along with an application to proceed in forma pauperis. The court granted the IFP application, screened the complaint under 28 U.S.C. §§ 1915(e)(2) and 1915A, denied the pending motion to appoint counsel as moot, dismissed the action for failure to state a claim, and directed the Clerk to enter judgment.

DISPOSITION

dismissed

CASES CITED

- Hill v. Lappin, 630 F.3d 468, 470–71 (6th Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 678–79 (2009)
- Nat'l Rifle Ass'n of Am. v. Vullo, 602 U.S. 175, 181 (2024)
- Inner City Contracting, LLC v. Charter Twp. of Northville, Michigan, 87 F.4th 743, 749 (6th Cir. 2023)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Wurzelbacher v. Jones-Kelley, 675 F.3d 580, 583 (6th Cir. 2012)
- Carl v. Muskegon Cnty., 763 F.3d 592, 595 (6th Cir. 2014)
- Rose v. Rutherford Cnty. Sheriff's Off., No. 3:22-CV-00046, 2022 WL 323977, at *2 (M.D. Tenn. Feb. 2, 2022)
- Matthews v. Jones, 35 F.3d 1046, 1049 (6th Cir. 1994)
- Tucker v. Rudd, No. 3:16-CV-00485, 2018 WL 1566825, at *1 (M.D. Tenn. Mar. 30, 2018)
- Miller v. Sanilac Cnty., 606 F.3d 240, 255 (6th Cir. 2010)
- O'Brien v. Michigan Dep't of Corr., 592 F. App'x 338, 341 (6th Cir. 2014)
- Colvin v. Caruso, 605 F.3d 282, 289 (6th Cir. 2010)
- Kensu v. Haigh, 87 F.3d 172, 175 (6th Cir. 1996)
- Horn by Parks v. Madison Cnty. Fiscal Ct., 22 F.3d 653, 659 (6th Cir. 1994)
- Anderson v. Hairabedian, No. 20-4177, 2022 WL 1411784, at *2–3 (6th Cir. Feb. 10, 2022)
- Patterson v. Novartis Pharms. Corp., 451 F. App'x 495, 498 (6th Cir. 2011)

- Keller v. Chippewa Cnty., Michigan Bd. of Commissioners, 860 F. App'x 381, 386 (6th Cir. 2021)
- Knox Cnty., Tennessee v. M.Q., 62 F.4th 978, 999–1000 (6th Cir. 2023)
- M.G. ex rel. C.G. v. Williamson Cnty. Schs., 720 F. App'x 280, 287 (6th Cir. 2018)
- Carter v. Washington, No. 23-1760, 2024 WL 3191094, at *5 (6th Cir. June 24, 2024)
- M.J. ex rel. S.J. v. Akron City Sch. Dist. Bd. of Educ., 1 F.4th 436, 452 n.9 (6th Cir. 2021)
- Cox v. Jackson, 579 F. Supp. 2d 831, 852 (E.D. Mich. 2008)
- Tucker v. Tennessee, 443 F. Supp. 2d 971, 972 (W.D. Tenn. 2006), aff'd, 539 F.3d 526 (6th Cir. 2008)
- Johnson v. City of Saline, 151 F.3d 564, 573–74 (6th Cir. 1998)
- Roell v. Hamilton Cnty., Ohio/Hamilton Cnty. Bd. of Cnty. Commissioners, 870 F.3d 471, 488 (6th Cir. 2017)
- Ability Ctr. of Greater Toledo v. City of Sandusky, 385 F.3d 901, 907 (6th Cir. 2004)
- Finley v. Huss, 102 F.4th 789, 820 (6th Cir. 2024)
- Jones v. City of Detroit, Michigan, 20 F.4th 1117, 1121 (6th Cir. 2021)
- Rodgers v. Smith, 842 F. App'x 929, 929 (5th Cir. 2021) (per curiam)
- Brown v. Clemens, No. 3:22-CV-01067, 2025 WL 2422615, at *8 (M.D. Pa. Aug. 21, 2025)
- Barnes v. Gorman, 536 U.S. 181, 189–90 (2002)
- Alkire v. Irving, 330 F.3d 802, 810 (6th Cir. 2003)

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