

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, HOUSTON DIVISION

Anthony Robinson and Latoya Robinson v. Brazos Valley Council of
Governments, et al.

Robinson · No. 4:26-cv-00016 · Decided March 12, 2026

SUMMARY

The United States District Court for the Southern District of Texas denied Anthony and Latoya Robinson's motions for appointment of counsel in a housing-dispute action. The court held that the plaintiffs had not proceeded in forma pauperis and had not demonstrated exceptional circumstances warranting appointed counsel under 28 U.S.C. § 1915(e)(1).

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	March 12, 2026
DOCKET	4:26-cv-00016
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved for appointment of counsel under 28 U.S.C. § 1915(e)(1) in an action involving housing, civil-rights, and administrative-law claims.
STANDARD OF REVIEW	The court applied the exceptional-circumstances standard governing appointment of counsel in civil cases under 28 U.S.C. § 1915(e)(1).
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status unknown
PARTIES	Anthony Robinson, Latoya Robinson v. Brazos Valley Council of Governments, Roger Sheridan, Harold Womble, Leanne Ray, Lilly Moncivais, Audrey De La Rosa, Yasmin Coleman, Linette Bounds, Jackie Hampton, Cassandra Karow

TOPICS

- civil procedure
- civil rights
- administrative law

PRACTICE AREAS

Civil procedure

Civil rights

Housing law

Administrative law

QUESTIONS PRESENTED

1. Whether the court should appoint counsel for Plaintiffs under 28 U.S.C. § 1915(e)(1).
2. Whether Plaintiffs demonstrated exceptional circumstances warranting appointment of counsel in this civil action.

HOLDINGS

1. A court may request counsel under 28 U.S.C. § 1915(e)(1) for an indigent litigant proceeding in forma pauperis, but Plaintiffs' failure to seek or obtain leave to proceed in forma pauperis independently warranted denial of their motions.
2. Plaintiffs did not establish exceptional circumstances warranting appointment of counsel because the case did not appear unusually complex, Plaintiffs had demonstrated an ability to investigate and present their claims, and they had not shown meaningful efforts to obtain private counsel.

KEY QUOTATIONS

“Under this statute, a court should appoint an attorney only when the case presents exceptional circumstances.” (Order)

“No exceptional circumstances justify appointing counsel.” (Order)

FACTUAL BACKGROUND

This is a housing dispute involving Plaintiffs' Section 8 housing voucher and claims against a governmental council, its employees, apartment employees, and a former neighbor. Plaintiffs alleged due-process violations, violations of the Violence Against Women Act and Fair Housing Act, and that termination of their voucher was arbitrary and capricious. Plaintiffs asserted that the case involved complex federal and administrative-law issues and that they needed counsel to review an administrative record.

PROCEDURAL HISTORY

Plaintiffs filed suit alleging violations of federal and state law arising from the termination of their Section 8 housing voucher. They filed two motions requesting court-appointed counsel. The district court denied both motions because Plaintiffs had not sought or obtained leave to proceed in forma pauperis and had not demonstrated exceptional circumstances.

DISPOSITION

other

CASES CITED

- Ulmer v. Chancellor, 691 F.2d 209, 212 (5th Cir. 1982)
- Lopez v. Reyes, 692 F.2d 15, 17 (5th Cir. 1982)
- Naranjo v. Thompson, 809 F.3d 793, 799 (5th Cir. 2015)
- Thomas v. Enriched Schs., 2024 WL 3496543, at *2-3 (E.D. La. July 19, 2024)

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