

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA

Jeremiah R. Hill v. Parker D. Hale

Hill v. Hale · No. 7:25-cv-00816 · Decided May 12, 2026

SUMMARY

The United States District Court for the Western District of Virginia granted Officer Parker D. Hale’s motion to dismiss Jeremiah R. Hill’s amended civil rights complaint. The court construed the claims as arising under 42 U.S.C. § 1983 and involving false arrest, false imprisonment, and alleged Fourth Amendment violations. It held that the claims accrued in August 2023, were barred by Virginia’s two-year limitations period, and that alleged concealment of body-camera footage did not toll the limitations period.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia
WRITING FOR THE COURT	Thomas T. Cullen
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	May 12, 2026
DOCKET	7:25-cv-00816
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought civil-rights and constitutional claims under 42 U.S.C. § 1983 against a police officer. Defendant moved to dismiss under Federal Rule of Civil Procedure 12(b)(6), arguing in part that the claims were barred by the statute of limitations.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court tests the legal sufficiency of the complaint, accepts well-pleaded allegations as true, draws reasonable inferences in the plaintiff’s favor, and determines whether the complaint states a facially plausible claim for relief.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court memorandum opinion
PARTIES	Jeremiah R. Hill v. Parker D. Hale

TOPICS

motions to dismiss

section 1983

statute of limitations

civil rights

police misconduct

PRACTICE AREAS

Civil rights

Constitutional law

Federal civil procedure

Statute of limitations

Police misconduct

QUESTIONS PRESENTED

1. Whether Hill's false-arrest and false-imprisonment claims under 42 U.S.C. § 1983 were filed within the applicable two-year statute of limitations.
2. Whether alleged concealment or deletion of body-camera footage tolled the statute of limitations under the fraudulent-concealment doctrine.
3. Whether Hill's claims for lost wages and emotional damages stated separate causes of action.
4. Whether Hill's separate civil-rights claim based on the August 8 entry was duplicative of his Fourth Amendment claim arising from the same encounter.

HOLDINGS

1. Section 1983 claims borrow the statute of limitations for the most analogous state-law cause of action; in Virginia, the applicable personal-injury limitations period is two years.
2. A § 1983 false-arrest claim accrues when the arrest occurs, while a false-imprisonment claim accrues when the false imprisonment ends, ordinarily upon arraignment.
3. Alleged concealment of body-camera footage did not toll the limitations period because the footage was not necessary for Hill to know the facts forming the basis of his claims.
4. Hill's claims were time-barred because the latest possible accrual date was August 17, 2023, the two-year limitations period expired on August 17, 2025, and Hill did not file until November 14, 2025.
5. Claims labeled as loss of wages and emotional damage describe alleged injuries for which relief is sought and are not separate causes of action.
6. Hill's separate claim alleging a Fourth Amendment violation based on Hale's preventing him from closing his door was duplicative of his false-arrest claim arising from the same August 8 encounter and would be considered with that claim.

KEY QUOTATIONS

“To survive a Rule 12(b)(6) motion, the complaint “must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’”” (at 2)

“The sine qua non of fraudulent concealment is that the defendant fraudulently concealed from the plaintiff his cause of action during the time in which plaintiff could have brought that action.” (at 6)

“At bottom, while Hill may have desired the body-cam footage—which, puzzlingly, he claims he already had access to via his attorney—to strengthen his claim, he did not need the footage to know the facts “that were the basis of [his] claim.”” (at 7)

FACTUAL BACKGROUND

Hill alleged that Officer Hale prevented him from closing his apartment door during an August 8, 2023 domestic-dispute response and thereby entered without exigent circumstances. Hill was arrested after that encounter and released on August 11. Hill further alleged that Hale arrested him at his apartment on August 14, 2023, pursuant to an alleged protective-order violation, and that an officer pointed a gun at his head when he exited; Hill was released on August 17. Hill claimed false arrest, false imprisonment, and Fourth Amendment violations, and asserted that missing body-camera footage fraudulently concealed facts relevant to his claims.

PROCEDURAL HISTORY

Hill filed his initial complaint on November 14, 2025, and an amended complaint on November 25, 2025. Hale moved to dismiss all claims on February 4, 2026. The court granted the motion and dismissed the amended complaint with prejudice.

DISPOSITION

dismissed

CASES CITED

- Edwards v. City of Goldsboro, 178 F.3d 231, 243 (4th Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 557, 570 (2007)
- Langford v. Joyner, 62 F.4th 122, 124 (4th Cir. 2023)
- D.A. Realestate Inv., LLC v. City of Norfolk, No. 2:21-cv-653, 2023 WL 2637382, at *4 (E.D. Va. Mar. 23, 2023)
- Owens v. Balt. City State's Att'ys Off., 767 F.3d 379, 388-89 (4th Cir. 2014)
- Wallace v. Kato, 549 U.S. 384, 387-88, 391-92 (2007)
- Gilmer v. Ofogh, No. 7:08-cv-00618, 2009 WL 1491040, at *2 (W.D. Va. May 26, 2009)
- Bay Area Laundry & Dry Cleaning Pension Tr. Fund v. Ferbar Corp. of Cal., 522 U.S. 192, 201 (1997)
- Brooks v. City of Winston-Salem, N.C., 85 F.3d 178, 182 (4th Cir. 1996)
- Graves v. Taylor, No. 3:19-cv-00033, 2021 WL 689265, at *3 (W.D. Va. Feb. 22, 2021)
- Edmonson v. Eagle Nat'l Bank, 922 F.3d 535, 549, 551 (4th Cir. 2019)
- Supermarket of Marlinton, Inc. v. Meadow Gold Dairies, Inc., 71 F.3d 119, 122 (4th Cir. 1995)
- Holmberg v. Armbrrecht, 327 U.S. 392, 397 (1946)
- Barnes v. W., Inc., 243 F. Supp. 2d 559, 563 (E.D. Va. 2003)
- Cardiello v. The Money Store, No. 00CIV.7332(NRB), 2001 WL 604007, at *4 (S.D.N.Y. June 1, 2001)