

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, MACON DIVISION

John Stephen Ravan v. Sheriff David Davis, et al.

Civil Action No. 5:25-cv-511 (MTT) · No. 5:25-cv-511 (MTT) · Decided December 19, 2025

SUMMARY

The United States District Court for the Middle District of Georgia grants John Stephen Ravan’s motion to proceed in forma pauperis under 28 U.S.C. § 1915. The court finds that the pro se complaint lacks sufficient factual allegations for a complete frivolity review and orders Ravan to file an amended complaint by January 9, 2026, linking each claim to a named defendant and providing supporting facts.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Macon Division
WRITING FOR THE COURT	Marc T. Treadwell
JURISDICTION	United States District Court for the Middle District of Georgia, Macon Division
DECIDED	December 19, 2025
DOCKET	5:25-cv-511 (MTT)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff proceeding pro se filed a civil-rights complaint and a motion to proceed in forma pauperis. The district court granted the IFP motion but ordered plaintiff to amend his complaint because the allegations were insufficient to conduct a complete screening review under 28 U.S.C. § 1915(e)(2)(B).
STANDARD OF REVIEW	For IFP eligibility, the court determines whether the affidavit satisfies the poverty requirement by comparing the applicant's assets and liabilities. For frivolity screening and failure to state a claim, the court applies 28 U.S.C. § 1915(e)(2)(B) and the Rule 12(b)(6) plausibility standard, while liberally construing a pro se pleading.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

TOPICS

motion to amend

pleadings

section 1983

prisoners rights

civil procedure

PRACTICE AREAS

civil procedure

civil rights

prisoner civil rights

QUESTIONS PRESENTED

1. Whether Ravan established eligibility to proceed in forma pauperis under 28 U.S.C. § 1915(a).
2. Whether the complaint could be subjected to a complete frivolity and failure-to-state-a-claim review under 28 U.S.C. § 1915(e)(2)(B) despite deficiencies in its factual allegations.
3. Whether Ravan should be given an opportunity to amend his pro se complaint and what pleading requirements would govern the amended complaint.

HOLDINGS

1. Ravan's affidavit established that he was unable to pay court fees without undue hardship, so the court granted his motion to proceed in forma pauperis.
2. The court did not dismiss the complaint at the initial screening stage because the deficient allegations might have resulted from the manner in which the pro se claims were pleaded; instead, it required an amended complaint containing sufficient factual and legal allegations for screening.
3. The amended complaint must replace and supersede the original complaint, identify the actions or omissions of each named defendant, link each claim to a defendant, state the timing and resulting injury, and identify the statutory or constitutional basis for each claim; Ravan may not incorporate the original complaint by reference.

KEY QUOTATIONS

“Thus, Ravan’s motion to proceed IFP (ECF 2) is GRANTED. But Ravan’s complaint lacks important factual allegations that Ravan may have omitted because of his pro se status. Thus, the Court ORDERS Ravan to amend his complaint by January 9, 2026.”

“The amended complaint will take the place of and supersede Ravan’s original complaint.”

FACTUAL BACKGROUND

Ravan, proceeding without counsel, asserted claims for cruel and unusual punishment, deliberate indifference to serious medical needs, and failure to protect against various jail officials and medical personnel. His complaint contained some factual allegations but did not adequately identify the conduct, timing, injuries, and legal basis associated with each defendant. The court concluded that the deficiencies might result from the manner in which the pro se claims were pleaded and gave him an opportunity to amend.

PROCEDURAL HISTORY

Ravan filed his complaint and IFP motion on November 21, 2025. The court reviewed the IFP affidavit, found that he could not pay filing fees without undue hardship, granted IFP status, and allowed him until January 9,

2026, to file an amended complaint rather than dismissing the action at that stage.

DISPOSITION

other

CASES CITED

- *Martinez v. Kristi Kleaners, Inc.*, 364 F.3d 1305, 1306-08 (11th Cir. 2004)
- *Adkins v. E.I. DuPont de Nemours & Co.*, 335 U.S. 331, 339 (1948)
- *Thomas v. Chattahoochee Jud. Cir.*, 574 F. App'x 916, 917 (11th Cir. 2014)
- *Phillips v. Mashburn*, 746 F.2d 782, 785 (11th Cir. 1984)
- *Mack v. Petty*, 2014 WL 3845777, at *1 (N.D. Ga. Aug. 4, 2014)
- *Carroll v. Gross*, 984 F.2d 392, 393 (11th Cir. 1993)
- *Thomas v. Harris*, 399 F. App'x 508, 509 (11th Cir. 2010)
- *Mitchell v. Farcass*, 112 F.3d 1483, 1490 (11th Cir. 1997)
- *Hughes v. Lott*, 350 F.3d 1157, 1160 (11th Cir. 2003)
- *Osahar v. U.S. Postal Serv.*, 297 F. App'x 863, 864 (11th Cir. 2008)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)
- *Duff v. Steub*, 378 F. App'x 868, 872 (11th Cir. 2010) (per curiam)
- *Schreane v. Middlebrooks*, 522 F. App'x 845, 847-48 (11th Cir. 2013)
- *Hoefling v. City of Miami*, 811 F.3d 1271, 1277 (11th Cir. 2016)