

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, SOUTHEASTERN DIVISION

Matthew T. Estes v. Robert N. Mayer, et al.

Estes · No. 1:25-CV-00186 SPM · Decided May 22, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri grants Matthew Estes’s application to proceed without prepaying fees and assesses an initial partial filing fee of \$22.66. The court dismisses his 42 U.S.C. § 1983 action without prejudice for failure to state a claim, concluding that official-capacity damages claims are barred by the Eleventh Amendment and that the judicial defendants are entitled to judicial immunity. The court also declines supplemental jurisdiction over any state-law claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	May 22, 2026
DOCKET	1:25-CV-00186 SPM
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented prisoner filed an action under 42 U.S.C. § 1983 and applied to proceed in forma pauperis. The district court granted in forma pauperis status, assessed an initial partial filing fee, screened the complaint under 28 U.S.C. § 1915(e)(2)(B), and dismissed the action without prejudice for failure to state a claim and/or frivolousness.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis complaint that is frivolous, malicious, or fails to state a claim. Failure to state a claim is evaluated under the plausibility standard of Bell Atlantic Corp. v. Twombly and Ashcroft v. Iqbal, while allegations in a self-represented complaint are liberally construed.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Matthew T. Estes v. Robert N. Mayer, Jeff Benoist, Judge Spielman

TOPICS

section 1983

prisoners rights

eleventh amendment immunity

civil rights

motions to dismiss

PRACTICE AREAS

civil rights

constitutional law

federal civil procedure

prisoner litigation

QUESTIONS PRESENTED

1. Whether the complaint stated a viable § 1983 claim against a state judicial-discipline commissioner sued in his official capacity.
2. Whether official-capacity claims for damages against the state defendants were barred by the Eleventh Amendment and by § 1983's person requirement.
3. Whether the claims against the state judges were barred by judicial immunity.
4. Whether the complaint was subject to dismissal under 28 U.S.C. § 1915(e)(2)(B).

HOLDINGS

1. A suit against Jeff Benoist in his official capacity was a suit against the Missouri Commission on the Retirement, Removal and Discipline of Judges and therefore against the State of Missouri; neither a State nor a state official acting in an official capacity is a person subject to a damages action under § 1983.
2. The Eleventh Amendment barred Estes's claims for money damages against the defendants in their official capacities because the State had not waived its immunity.
3. Judges Mayer and Spielman were entitled to absolute judicial immunity from Estes's claims arising from their conduct while presiding over his criminal cases.
4. The complaint was frivolous and/or failed to state a plausible claim for relief, and dismissal without prejudice was appropriate under 28 U.S.C. § 1915(e)(2)(B).

KEY QUOTATIONS

"A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged."

"neither a State nor its officials acting in their official capacities are 'persons' under § 1983."

"Like other forms of official immunity, judicial immunity is an immunity from suit, not just from ultimate assessment of damages."

FACTUAL BACKGROUND

Matthew Estes, an inmate at the Eastern Reception Diagnostic and Correctional Center, sued Judge Robert Mayer and Jeff Benoist, a commissioner with Missouri's Commission on the Retirement, Removal and Discipline of Judges, under 42 U.S.C. § 1983. Estes alleged that Mayer and, in one proceeding, Judge Spielman, addressed him by an incorrect name during criminal proceedings, which Estes characterized as defamation and a

civil-rights violation. He also alleged that he complained to the commission but that no action was taken, and sought damages, impeachment of Mayer, and correction of court records.

PROCEDURAL HISTORY

Estes sued a state judge and a state judicial-discipline commissioner in their official capacities, alleging that judges used an incorrect version of his name in criminal proceedings and that the commissioner failed to act on his complaint. The court reviewed the complaint and supplemental documents, granted his application to proceed without prepaying fees, assessed an initial partial filing fee of \$22.66, and dismissed the federal claims under the in forma pauperis screening statute. The court declined supplemental jurisdiction over any Missouri-law claims and directed that a separate order of dismissal accompany the memorandum and order.

DISPOSITION

dismissed

CASES CITED

- *Neitzke v. Williams*, 490 U.S. 319, 328 (1989)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009)
- *Estelle v. Gamble*, 429 U.S. 97, 106 (1976)
- *Solomon v. Petray*, 795 F.3d 777, 787 (8th Cir. 2015)
- *Stone v. Harry*, 364 F.3d 912, 914-15 (8th Cir. 2004)
- *Martin v. Aubuchon*, 623 F.2d 1282, 1286 (8th Cir. 1980)
- *McNeil v. United States*, 508 U.S. 106, 113 (1993)
- *Levy v. Ohl*, 477 F.3d 988, 991 (8th Cir. 2007)
- *Stutzka v. McCarville*, 420 F.3d 757, 760 n. 2 (8th Cir. 2005)
- *State v. Estes*, 659 S.W.3d 655 (Mo. Ct. App. 2023)
- *Will v. Mich. Dep’t of State Police*, 491 U.S. 58, 71 (1989)
- *White v. Jackson*, 865 F.3d 1064, 1075 (8th Cir. 2017)
- *Johnson v. Outboard Marine Corp.*, 172 F.3d 531, 535 (8th Cir. 1999)
- *Calzone v. Hawley*, 866 F.3d 866, 872 (8th Cir. 2017)
- *Morstad v. Dep’t of Corr. & Rehab.*, 147 F.3d 741, 744 (8th Cir. 1998)
- *Andrus ex rel. Andrus v. Ark.*, 197 F.3d 953, 955 (8th Cir. 1999)
- *Arizonans for Official English v. Ariz.*, 520 U.S. 43, 69 n.24 (1997)
- *Hamilton v. City of Hayti, Missouri*, 948 F.3d 921, 925 (8th Cir. 2020)
- *Mireles v. Waco*, 502 U.S. 9, 11 (1991)
- *Pierson v. Ray*, 386 U.S. 547, 554 (1967)
- *Woodworth v. Hulshof*, 891 F.3d 1083, 1090 (8th Cir. 2018)

- Justice Network, Inc. v. Craighead Cty., 931 F.3d 753, 760 (8th Cir. 2019)
- United Mine Workers v. Gibbs, 383 U.S. 715, 726 (1966)
- Crest Construction II, Inc. v. Doe, 660 F.3d 346, 359 (8th Cir. 2011)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-mis/2026/matthew-estes-v-robert-n-mayer-et-al-3ddtsq4g>