

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Russell Eric Lenard v. State of Tennessee and Tim Wilson

Lenard · No. 1:24-cv-238 · Decided March 16, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee construes Russell Eric Lenard’s filings as claims under 42 U.S.C. § 1983 rather than habeas claims. The court denies his request for appointed counsel, dismisses his constitutional claims under Heck v. Humphrey, declines supplemental jurisdiction over state-law claims, and directs the Clerk to provide a § 2254 petition form. The action is dismissed under the Prison Litigation Reform Act, and the court certifies that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Travis R. McDonough
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	March 16, 2026
DOCKET	1:24-cv-238
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner filed pro se pleadings seeking relief concerning his guilty pleas, counsel's representation, and the validity of his convictions. The district court construed the pleadings as claims under 42 U.S.C. § 1983, denied appointment of counsel, screened the claims under the Prison Litigation Reform Act, and dismissed the action.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, the court must screen prisoner complaints and may dismiss claims that are frivolous, malicious, fail to state a claim, or seek relief from an immune defendant. The Rule 12(b)(6) plausibility standard governs the failure-to-state-a-claim inquiry. Pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

- section 1983
- federal habeas corpus
- prisoners rights
- post-conviction relief
- civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

habeas corpus

civil procedure

QUESTIONS PRESENTED

1. Whether the prisoner's pleadings should be construed as claims under 42 U.S.C. § 1983 or as a petition for federal habeas corpus relief under 28 U.S.C. § 2254.
2. Whether the prisoner was entitled to appointment of counsel in the civil action.
3. Whether claims whose success would imply the invalidity of criminal convictions are cognizable under § 1983 before those convictions have been invalidated.
4. Whether claims seeking release from confinement must be brought through habeas corpus rather than § 1983.
5. Whether the court should exercise supplemental jurisdiction over the remaining state-law claims after dismissing the federal claims.

HOLDINGS

1. The court construed Lenard's relevant filings as seeking relief under 42 U.S.C. § 1983 rather than under 28 U.S.C. § 2254 because the pleadings primarily asserted tort, contract, and constitutional claims, and any habeas claims had not been exhausted in state court.
2. Lenard was not entitled to appointment of counsel because he failed to show exceptional circumstances.
3. Lenard's claims challenging the validity of his criminal convictions based on counsel's conduct and the alleged invalidity of his guilty plea were not cognizable under § 1983 because success would imply the invalidity of the convictions, and the convictions had not been invalidated.
4. To the extent Lenard sought release from confinement based on the convictions, he was required to pursue that relief through a petition for a writ of habeas corpus rather than through § 1983.
5. After dismissing the federal claims, the court declined to exercise supplemental jurisdiction over Lenard's remaining state-law claims and dismissed them without prejudice.

KEY QUOTATIONS

“Mr. Lenard’s claims challenging the validity of his criminal convictions due to his counsel’s actions and/or the fact that his guilty plea is not an enforceable contract are not cognizable under § 1983” (Section III.B)

“The Court CERTIFIES that any appeal from the dismissal this action would not be taken in good faith and would be totally frivolous.” (Section IV)

FACTUAL BACKGROUND

Lenard, a state prisoner, alleged that attorney Tim Wilson improperly persuaded him to plead guilty to two misdemeanor charges by using fraud, undue influence, coercion, and allegedly deficient representation. He contended that the guilty plea was invalid because it was made under duress and was not signed by the judge, and he sought rescission of the plea, dismissal of the criminal case, or a retrial with different counsel. His filings

indicated that appeals from the relevant convictions remained pending in the Tennessee Court of Criminal Appeals and that no court had reversed, expunged, or otherwise invalidated the convictions.

PROCEDURAL HISTORY

Lenard filed a petition for writ of certiorari, a petition for error, and a form complaint against the State of Tennessee and Tim Wilson. His filings indicated that appeals from the underlying convictions were pending in the Tennessee Court of Criminal Appeals. The district court construed the filings as a § 1983 action rather than a habeas petition, denied his request for appointed counsel, dismissed the constitutional claims under the PLRA, declined supplemental jurisdiction over state-law claims, certified that an appeal would not be taken in good faith, and directed the Clerk to send Lenard a § 2254 form.

DISPOSITION

dismissed

CASES CITED

- O’Sullivan v. Boerckel, 526 U.S. 838, 842 (1999)
- Manning v. Alexander, 912 F.2d 878, 881 (6th Cir. 1990)
- Justices v. Boston Mun. Court v. Lydon, 466 U.S. 294, 302–03 (1984)
- Prather v. Rees, 822 F.2d 1418, 1422 (6th Cir. 1987)
- Lavado v. Keohane, 992 F.2d 601, 605–06 (6th Cir. 1993)
- Reneer v. Sewell, 975 F.2d 258, 261 (6th Cir. 1992)
- Benson v. O’Brian, 179 F.3d 1014 (6th Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662, 678, 681 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Hill v. Lappin, 630 F.3d 468, 470–71 (6th Cir. 2010)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Heck v. Humphrey, 512 U.S. 477, 486 (1994)
- Preiser v. Rodriguez, 411 U.S. 475, 500 (1973)
- United Mine Workers of Am. v. Gibbs, 383 U.S. 715, 726–27 (1966)
- Castro v. United States, 540 U.S. 375, 382 (2003)