

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

Angela Ballanger, et al. v. Missouri State Hospital, et al.

Ballanger · No. 4:25-cv-01381-SRW · Decided February 12, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri determined that the claims of four self-represented plaintiffs were improperly joined under Federal Rule of Civil Procedure 20. The court struck Jamie Jones, Jada Davis, and Rudolph Atkins, Sr. from the action, directed the Clerk to open separate cases for them, and required Angela Ballanger to file a signed second amended complaint and a new application to proceed in forma pauperis. The court warned that failure to comply would result in dismissal without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 12, 2026
DOCKET	4:25-cv-01381-SRW
DISPOSITION	other
PROCEDURAL POSTURE	Self-represented plaintiffs filed a joint 42 U.S.C. § 1983 action alleging unconstitutional conditions of detention. The court sua sponte determined that the plaintiffs and claims were improperly joined, struck three plaintiffs, directed the Clerk to open separate cases for them, denied the joint in forma pauperis motion, and ordered the remaining plaintiff to file a signed second amended complaint and a new in forma pauperis motion.
STANDARD OF REVIEW	Permissive joinder under Federal Rule of Civil Procedure 20 is subject to the district court's discretion, including discretion to refuse or sever joinder to prevent prejudice and delay, promote judicial economy, and protect fundamental fairness.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; persuasive rather than precedential.

PARTIES

Angela Ballanger, Jamie Jones, Jada Davis, Rudolph Atkins, Sr. v.
Missouri State Hospital, Katie Thumann

TOPICS

joinder

class actions

pleadings

civil procedure

section 1983

PRACTICE AREAS

civil procedure

civil rights

prisoner and detainee litigation

constitutional law

QUESTIONS PRESENTED

1. Whether the four plaintiffs satisfied the requirements for permissive joinder under Federal Rule of Civil Procedure 20.
2. Whether the court could sever improperly joined plaintiffs and claims on its own motion under Federal Rule of Civil Procedure 21.
3. Whether self-represented plaintiffs could proceed jointly in a purported class action or represent the rights and claims of other plaintiffs.
4. Whether the joint motion to proceed in forma pauperis should be denied after the action was limited to Ballanger.
5. Whether Ballanger was required to file a signed second amended complaint after the existing amended complaint was incomplete and unsigned.

HOLDINGS

1. The plaintiffs could not proceed jointly because the record did not show that their claims arose from the same transaction, occurrence, or series of transactions and did not show a common question of law or fact; their claims were factually and procedurally distinct.
2. The court could, on its own motion, sever the improperly joined plaintiffs and claims and require the severed plaintiffs to proceed in separate actions.
3. Self-represented, nonlawyer plaintiffs may not represent the rights, claims, or interests of other individuals or adequately represent a class under Federal Rule of Civil Procedure 23.
4. The joint motion to proceed in forma pauperis was properly denied because the action was proceeding with Ballanger alone and she was required to submit a new motion containing her own financial information.
5. Ballanger was required to file a signed second amended complaint on the court-provided form, and the second amended complaint would supersede the earlier pleadings.

KEY QUOTATIONS

“Rule 20(a)(1) allows permissive joinder of plaintiffs in one action if: “(A) they assert any right to relief jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence, or

series of transactions or occurrences; and (B) any question of law or fact common to all plaintiffs will arise in the action.”” (Discussion, Section II)

“Plaintiffs’ claims appear discrete and separate, justifying severance of these claims under Federal Rule 21.” (Discussion, Section II)

“it is well established that self-represented litigants cannot represent the rights, claims and interests of other parties in any cause of action, including a class action lawsuit.” (Discussion, Section II)

“If a plaintiff amends her complaint, the new pleading ‘supersedes’ the old one: The ‘original pleading no longer performs any function in the case.’” (Amended Complaint)

FACTUAL BACKGROUND

The four plaintiffs were current or former detainees at the Metropolitan St. Louis Psychiatric Center, but they were detained at different times: Ballanger in 2017, Atkins in 2019, and Jones and Davis in 2023. Their filings described different alleged injuries and, in the amended complaints, different defendants and factual circumstances. Ballanger had been released, while the other three plaintiffs remained detained at a state mental-health facility.

PROCEDURAL HISTORY

Four plaintiffs filed a single complaint and joint motion to proceed in forma pauperis. After separate amended complaints and other filings were submitted, the court concluded that the plaintiffs' claims involved different detention periods, facts, defendants, and circumstances. The court severed the claims under Rules 20 and 21, retained Angela Ballanger as the plaintiff in the present action, and ordered the other plaintiffs' filings transferred to newly opened cases.

DISPOSITION

other

CASES CITED

- Warth v. Seldin, 422 U.S. 490, 499 (1975)
- Lewis v. Lenc-Smith Manufacturing Co., 784 F.2d 829, 830 (7th Cir. 1986)
- Mosley v. General Motors Corp., 497 F.2d 1330, 1332-33 (8th Cir. 1974)
- Acevedo v. Allsup's Convenience Stores, Inc., 600 F.3d 516, 521 (5th Cir. 2010)
- Gaffney v. Riverboat Services of Indiana, Inc., 451 F.3d 424, 442 (7th Cir. 2006)
- Biron v. Sawyer, 2020 WL 6121270, at *5 (D. Minn. Aug. 21, 2020)
- Georgeoff v. Barnes, 2009 WL 1405497 (E.D. Mo. May 18, 2009)
- Hagwood v. Warden, 2009 WL 427396, at *2 (D.N.J. Feb. 19, 2009)
- Knoefler v. United Bank of Bismarck, 20 F.3d 347, 348 (8th Cir. 1994)
- Casey-El v. City of St. Louis Department of Public Safety, 2022 WL 17250170, at *2 (E.D. Mo. 2022)

- *Vanderbilt v. Arkansas Department of Corrections*, 2023 WL 348410, at *2 (E.D. Ark. 2023)
- *Royal Canin U.S.A., Inc. v. Wulschleger*, 604 U.S. 22, 35 (2025)
- *In re Wireless Telephone Federal Cost Recovery Fees Litigation*, 396 F.3d 922, 928 (8th Cir. 2005)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-mis/2026/angela-ballanger-et-al-v-missouri-state-hospital-et-al-3zv5y320>