

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION

James V. Brown v. Aneeka Collins, et al.

No. 1:25-CV-176 (S.D. Ohio Dec. 29, 2025) · No. 1:25-CV-176 · Decided December 29, 2025

SUMMARY

The United States District Court for the Southern District of Ohio overruled James V. Brown’s objections to two Magistrate Judge Reports and Recommendations and adopted both recommendations in full. The court denied Brown’s motion for default judgment, dismissed without prejudice claims challenging the validity of his state criminal judgment, and dismissed most remaining federal claims, while allowing specified unlawful-arrest, deliberate-indifference, and conditions-of-confinement claims to proceed against unnamed defendants. The court also denied leave to appeal in forma pauperis.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Michael R. Barrett
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division
DECIDED	December 29, 2025
DOCKET	1:25-CV-176
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff objected to two Magistrate Judge Reports and Recommendations in a prisoner civil-rights action brought under 42 U.S.C. § 1983. The district court reviewed the timely objections, adopted both R&Rs, denied Plaintiff's motion for default judgment, dismissed some claims without prejudice and others with prejudice, allowed three categories of claims to proceed against unnamed defendants, and denied leave to appeal in forma pauperis.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 72(b)(3) and 28 U.S.C. § 636(b)(1), the district court conducts de novo review of properly objected-to portions of a magistrate judge's disposition on dispositive matters. Vague, general, conclusory, frivolous, or otherwise inadequate objections do not trigger de novo review.

TOPICS

section 1983 prisoners rights appellate procedure standard of review default judgment

PRACTICE AREAS

civil rights federal civil procedure prisoner litigation appellate procedure

QUESTIONS PRESENTED

1. Whether Brown's objections adequately challenged the Magistrate Judge's recommendations concerning the claims against Sanders and Oyer.
2. Whether Brown's conclusory objections warranted de novo review or cured deficiencies in his complaint.
3. Whether the properly named defendants were immune from official-capacity damages claims or were not persons or state actors under 42 U.S.C. § 1983.
4. Whether Brown stated a § 1983 claim based on alleged legal malpractice by his public defender.
5. Whether alleged restrictions on law-library access stated a cognizable constitutional claim.
6. Whether Brown was entitled to default judgment against Jerry Oyer.
7. Whether claims attacking the validity of Brown's criminal judgment should be dismissed without prejudice while specified unlawful-arrest, deliberate-indifference, and conditions-of-confinement claims proceeded.

HOLDINGS

1. A plaintiff may not cure fatal deficiencies in a complaint by presenting conclusory allegations for the first time in objections to a report and recommendation; Brown's objections regarding Oyer and Sanders were inadequate.
2. Properly objected-to portions of a dispositive report and recommendation receive de novo review, but vague, general, conclusory, frivolous, or otherwise insufficient objections do not trigger de novo review.
3. The challenged claims were properly dismissed where the entities were not persons under § 1983, the officials were not adequately connected personally to the alleged misconduct, official-capacity damages were barred by immunity, or the complaint failed to state a claim.
4. Brown failed to state a claim based on law-library access because he did not allege facts showing that he was actually impeded in an existing or contemplated action, and his representation by counsel defeated his asserted need for hybrid-representation access.
5. Brown was not entitled to default judgment against Oyer.
6. Brown's claims challenging the validity of his criminal judgment were dismissed without prejudice, while specified Fourth and Fourteenth Amendment claims against unnamed officers and jail personnel

were permitted to proceed.

KEY QUOTATIONS

“When objections are made to a Magistrate Judge’s R&R on a dispositive matter, the Court “must determine de novo any part of the magistrate judge’s disposition that has been properly objected to.”” (Standard of Law section)

“Brown cannot merely put forth conclusory allegations for the first time in his objections to a report and recommendation.” (PageID 153)

“The motion for default judgment, (Doc. 30), is DENIED, and Brown’s claims challenging the validity of his criminal judgment are DISMISSED without prejudice.” (Conclusion)

“Brown’s remaining federal claims are DISMISSED with prejudice, with the exception of his Fourth Amendment unlawful arrest claim against unnamed Greenfield Police Officers, his Fourteenth Amendment deliberate indifference claim against officers and/or deputies of the Highland County Jail, and his Fourteenth Amendment conditions- of-confinement claim against the Highland County Jail.” (Conclusion)

FACTUAL BACKGROUND

Brown alleged a broad conspiracy involving state and local officials, police officers, prosecutors, a judge, defense counsel, and governmental entities, asserting that he was subjected to invalid criminal charges, a coerced guilty plea, an illegal sentence, unlawful arrest, inadequate medical care, unconstitutional jail conditions, and inadequate law-library access. He sought \$10,800,000 in damages, release from prison, expungement of his conviction, and investigations. He also sought default judgment against Greenfield Police Chief Jerry Oyer based on an allegedly unanswered summons.

PROCEDURAL HISTORY

The Magistrate Judge screened the complaint under 28 U.S.C. § 1915 and issued a July 17, 2025 R&R recommending dismissal of most claims while allowing certain unlawful-arrest, deliberate-indifference, and jail-conditions claims to proceed. A September 9, 2025 R&R addressed additional matters, including Plaintiff's motion for default judgment. Plaintiff timely objected to the July R&R but not the September R&R. The district court overruled the objections, adopted both R&Rs in full, denied default judgment, dismissed the claims challenging the validity of Plaintiff's criminal judgment without prejudice, and dismissed the remaining federal claims with prejudice except for the specified claims against unnamed officers and jail personnel.

DISPOSITION

other

REMAND INSTRUCTIONS

The parties were instructed to proceed as directed by the Magistrate Judge, including continuation of the specified claims against unnamed Greenfield Police Officers and Highland County Jail officers or deputies.

CASES CITED

- Miller v. Currie, 50 F.3d 373, 380 (6th Cir. 1995)
- Berkshire v. Dahl, 928 F.3d 520, 530 (6th Cir. 2019)
- Cole v. Yukins, 7 F. App'x 354, 356 (6th Cir. 2001)
- Spencer v. Bouchard, 449 F.3d 721, 725 (6th Cir. 2006)
- Mira v. Marshall, 806 F.2d 636, 637-38 (6th Cir. 1986) (per curiam)
- Nettles v. Wainwright, 677 F.2d 404, 410 n.8 (5th Cir. 1982)
- Victor v. Dosson, No. 11-CV-13103, 2011 U.S. Dist. LEXIS 146137, at *5 (E.D. Mich. Sept. 21, 2011)
- Laney v. Farley, 501 F.3d 577, 581 n.2 (6th Cir. 2007)
- State v. Martin, 816 N.E.2d 227, 232 (Ohio 2004)

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