

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, HOUSTON DIVISION

Corinthia Williams v. Deputy Brian Meyer, in his individual capacity

Williams v. Meyer · No. 4:24-cv-596 · Decided January 15, 2026

SUMMARY

The United States District Court for the Southern District of Texas grants Deputy Brian Meyer’s motion for summary judgment based on qualified immunity in Corinthia Williams’s 42 U.S.C. § 1983 action. The court holds that the independent intermediary doctrine defeats Williams’s unlawful-seizure claim and that probable cause and exigent circumstances justified Meyer’s warrantless entry. The court also dismisses with prejudice the withdrawn excessive-force and Fourteenth Amendment claims.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
WRITING FOR THE COURT	Andrew S. Hanen
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	January 15, 2026
DOCKET	4:24-cv-596
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for summary judgment based on qualified immunity in Plaintiff's 42 U.S.C. § 1983 action. The court granted the motion and dismissed all claims with prejudice.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. In the qualified-immunity context, the plaintiff bears the burden of showing a genuine and material factual dispute as to whether the official is entitled to immunity. The court viewed the body-camera evidence in the light depicted by the video where it discredited Plaintiff's account.
PRECEDENTIAL VALUE	unpublished district court order; persuasive only
PARTIES	Corinthia Williams v. Deputy Brian Meyer, in his individual capacity

TOPICS

section 1983 qualified immunity summary judgment civil rights constitutional law

PRACTICE AREAS

civil rights litigation constitutional torts qualified immunity Fourth Amendment federal civil procedure

QUESTIONS PRESENTED

1. Whether Meyer was entitled to qualified immunity on Williams's Fourth Amendment false-arrest or unlawful-seizure claim.
2. Whether Meyer's warrantless entry into Williams's home to arrest her for interference with public duties violated the Fourth Amendment.
3. Whether Williams's excessive-force claim remained before the court after she withdrew it.
4. Whether Williams's Fourteenth Amendment claims remained before the court after she withdrew them.

HOLDINGS

1. Meyer was entitled to qualified immunity on Williams's false-arrest claim because the independent-intermediary doctrine broke the causal chain between Meyer's conduct and the arrest, and Williams failed to show that the magistrate's decision was tainted by Meyer's actions.
2. Meyer was entitled to qualified immunity on Williams's unlawful-entry claim because his warrantless entry into the home was justified by probable cause to arrest Williams for the jailable offense of interference with public duties and exigent circumstances arising from her retreat into the home while resisting arrest.
3. The excessive-force claim was dismissed with prejudice because Williams expressly withdrew it in her response to the motion.
4. The Fourteenth Amendment claims were dismissed with prejudice because Williams expressly withdrew them.

KEY QUOTATIONS

“Under the independent intermediary doctrine, “if an independent intermediary, such as a justice of the peace [or magistrate], authorizes an arrest, then the initiating party cannot be liable for false arrest.”” (at 6)

“A warrantless entry into a home is presumptively unreasonable.” (at 9)

“It was reasonable for Deputy Meyer to believe that Williams was impeding his investigation in violation of the interference with public duties statute.” (at 12)

FACTUAL BACKGROUND

Deputy Brian Meyer went to Corinthia Williams's residence to investigate an alleged assault involving her adult daughter, Kailyn. Williams repeatedly prevented Meyer from speaking with Kailyn alone, physically positioned herself and the partially open door between Meyer and Kailyn, and later instructed Kailyn to go upstairs. After

Meyer attempted to detain Williams for interfering with his investigation, a physical struggle occurred, Williams was arrested, and a magistrate issued an arrest warrant based on Meyer's probable-cause affidavit. The county later declined to prosecute the charges.

PROCEDURAL HISTORY

Williams sued Deputy Meyer under 42 U.S.C. § 1983 based on events surrounding her arrest and his entry into her home. Meyer moved for summary judgment based on qualified immunity, and Williams responded. Williams withdrew her excessive-force and Fourteenth Amendment claims in her response. The district court granted the motion and dismissed all claims with prejudice, directing that a final appealable judgment be entered separately.

DISPOSITION

dismissed

CASES CITED

- Triple Tee Golf, Inc. v. Nike, Inc., 485 F.3d 253, 261 (5th Cir. 2007)
- Celotex Corp. v. Catrett, 477 U.S. 317, 321-25 (1986)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 587 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 255 (1986)
- Malacara v. Garber, 353 F.3d 393, 405 (5th Cir. 2003)
- Scott v. Harris, 550 U.S. 372, 380-81 (2007)
- Garcia v. Orta, 47 F.4th 343, 353 (5th Cir. 2022)
- Harlow v. Fitzgerald, 457 U.S. 800, 818 (1982)
- Pratt v. Harris Cty. Tex., 822 F.3d 174, 181 (5th Cir. 2016)
- Malley v. Briggs, 475 U.S. 335, 341 (1986)
- Brown v. Callahan, 623 F.3d 249, 253 (5th Cir. 2010)
- Trent v. Wade, 776 F.3d 368, 376 (5th Cir. 2015)
- Glenn v. City of Tyler, 242 F.3d 307, 313 (5th Cir. 2001)
- Spiller v. City of Tex. City Police Dep't, 130 F.3d 162, 165 (5th Cir. 1997)
- Sorenson v. Ferrie, 134 F.3d 325, 330 (5th Cir. 1998)
- Brown v. Lyford, 243 F.3d 185, 190 (5th Cir. 2001)
- Pierson v. Ray, 386 U.S. 547, 555 (1967)
- Shaw v. Villanueva, Shaw v. Villanueva, 918 F.3d 414, 417 (5th Cir. 2019)
- Hall v. Trochessett, 105 F.4th 335, 342 (5th Cir. 2024), cert. denied, 145 S. Ct. 1173 (2025)
- McLin v. Ard, 866 F.3d 682, 689 (5th Cir. 2017)
- Buehler v. City of Austin, 824 F.3d 548, 554 & n.5 (5th Cir. 2016)
- Cuadra v. Houston Indep. Sch. Dist., 626 F.3d 808, 813 (5th Cir. 2010)
- Curtis v. Sowell, 761 F. App'x 302, 305 (5th Cir. 2019)

- Payton v. New York, 445 U.S. 573, 586 (1980)
- Minnesota v. Olson, 495 U.S. 91, 100 (1990)
- United States v. Rico, 51 F.3d 495, 500-01 (5th Cir. 1995)
- Kentucky v. King, 563 U.S. 452, 460 (2011)
- United States v. Santana, 427 U.S. 38, 42-43 (1976)
- Kirk v. Louisiana, 536 U.S. 635, 638 (2002)
- Michigan v. DeFillippo, 443 U.S. 31, 37 (1979)
- Eisenbach v. Zatzkin, 728 F. App'x 307, 311 (5th Cir. 2018)
- Huang v. Harris County, 264 F.3d 1141 (5th Cir. 2001)
- Pearlman v. City of Fort Worth, 400 F. App'x 956, 959 (5th Cir. 2010)
- Childers v. Iglesias, 848 F.3d 412, 415 (5th Cir. 2017)
- Trochessett v. City of ..., 105 F.4th 335, 342-43 (5th Cir. 2024)
- Freeman v. Gore, 483 F.3d 404, 414 (5th Cir. 2007)
- Lewis v. Delgado, No. 24-20484, 2026 WL 44682 (5th Cir. Jan. 7, 2026)
- Solis v. Serrett, 31 F.4th 975 (5th Cir. 2022)