

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Jaquel M. Jones v. Heather Pippin et al.

Civil No. 26-1268-BAH (D. Md. Apr. 28, 2026) · No. Civil No. 26-1268-BAH · Decided April 28, 2026

SUMMARY

The United States District Court for the District of Maryland grants Jaquel M. Jones leave to proceed in forma pauperis but concludes that her pro se complaint alleging potential Fair Housing Act reasonable-accommodation, discrimination, and retaliation claims fails to state a claim. The court grants her 21 days to file an amended complaint and addresses several other pending motions, denying or granting them in part as specified.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Brendan A. Hurson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 28, 2026
DOCKET	Civil No. 26-1268-BAH
DISPOSITION	other
PROCEDURAL POSTURE	On initial screening under 28 U.S.C. § 1915(e)(2)(B), the court found that the pro se complaint failed to state a claim but granted leave to amend. The court also ruled on several ancillary motions.
STANDARD OF REVIEW	The court conducted initial screening under 28 U.S.C. § 1915(e)(2)(B), dismissing or requiring amendment of claims that are frivolous or malicious, fail to state a claim, or seek monetary relief from an immune defendant. Pro se pleadings are construed liberally, but liberal construction does not excuse failure to allege facts supporting a cognizable claim.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum and order; precedential status unknown
PARTIES	Jaquel M. Jones v. Heather Pippin, Ingerman Parkland Apartments, LLC, Housing Authority, Ingerman Management

TOPICS

pleadings

civil procedure

reasonable accommodation

ada / disability

landlord tenant

PRACTICE AREAS

civil rights

fair housing

civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a cognizable claim under the Fair Housing Act for disability discrimination or denial of reasonable accommodation.
2. Whether the complaint stated a cognizable Fair Housing Act retaliation claim.
3. Whether the complaint satisfied the Federal Rules of Civil Procedure's pleading requirements.
4. Whether the plaintiff should be granted leave to amend because she proceeded pro se and potentially had cognizable claims.
5. Whether the plaintiff's ancillary motions for filing acceptance, remote participation, reasonable accommodation, and waiver of costs should be granted.

HOLDINGS

1. The complaint failed to state a claim because it did not allege sufficient facts identifying the plaintiff's disability, the accommodation requested, the alleged discriminatory conduct, or the relevant events.
2. A plaintiff asserting denial of a reasonable accommodation under the Fair Housing Act must show that the proposed accommodation was reasonable and necessary to afford persons with disabilities an equal opportunity to use and enjoy housing.
3. To state a retaliation claim under 42 U.S.C. § 3617, a plaintiff must allege protected activity, the defendant's awareness of that activity, adverse action, and a causal connection between the protected activity and adverse action.
4. Because Jones proceeded pro se and potentially had cognizable claims, she was entitled to an opportunity to file an amended complaint.
5. The amended complaint must contain a short and plain statement showing entitlement to relief, a request for relief, and allegations that are simple, concise, and direct; labels, conclusions, and formulaic recitations are insufficient.

KEY QUOTATIONS

“Nonetheless, liberal construction does not mean that this Court can ignore a clear failure in the pleading to allege facts which set forth a cognizable claim.”

“Plaintiff's amended complaint will replace all previous complaints and supplements filed.”

“The general rule is, “an amended pleading ordinarily supersedes the original and renders it of no legal effect.””

FACTUAL BACKGROUND

Jones sued housing-related defendants and appeared to allege disability discrimination, denial of reasonable accommodation, and retaliation connected with her housing and voucher status. Her complaint referenced a disability-related accommodation request, fair-housing-rights retaliation, and an eviction-related housing-authority decision, but did not provide a factual statement explaining the events. The attachments included correspondence with Department of Housing and Urban Development offices and documents concerning a closed landlord-tenant matter in Cecil County.

PROCEDURAL HISTORY

Jones filed a pro se complaint alleging apparent disability-related housing discrimination, denial of reasonable accommodation, and retaliation under the Fair Housing Act, together with a motion to proceed in forma pauperis and several other motions and requests. The court granted in forma pauperis status, found the complaint deficient because it lacked a coherent statement of facts and did not identify the disability, requested accommodation, protected activity, or adverse action, and ordered Jones to file an amended complaint within 21 days. The court granted the motion to accept filings in part, denied the remote-participation request as premature, denied the accommodation request without prejudice, and denied the cost-waiver request as moot.

DISPOSITION

other

CASES CITED

- Lomax v. Ortiz-Marquez, 140 S. Ct. 1721, 1723 (2020)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Weller v. Dep't of Soc. Servs., 901 F.2d 387, 391 (4th Cir. 1990)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1278 (4th Cir. 1985)
- Affinity Recovery Ctr., LLC v. Town Commissioners of Sudlersville, Civ. No. 23-00714-LKG, 2024 WL 149835, at *6 (D. Md. Jan. 12, 2024)
- Roberson v. Graziano, Civ. No. WDQ-09-3038, 2010 WL 2106466, at *2 (D. Md. May 21, 2010)
- Roberson v. Graziano, 411 F. App'x 583 (4th Cir. 2011)
- Grp. Home on Gibson Island, LLC v. Gibson Island Corp., 144 F.4th 522, 532 (4th Cir. 2025)
- Scoggins v. Lee's Crossing Homeowners Ass'n, 718 F.3d 262, 272 (4th Cir. 2013)
- Bryant Woods Inn, Inc. v. Howard Cnty., 124 F.3d 597, 603-04 (4th Cir. 1997)
- Elderhaven, Inc. v. City of Lubbock, 98 F.3d 175, 178 (5th Cir. 1996)
- Hall v. Greystar Mgmt. Servs., L.P., 637 F. App'x 93, 98 (4th Cir. 2016)
- King v. Rumsfeld, 328 F.3d 145, 150-51 (4th Cir. 2003)
- Campbell v. StoneMor Partners, LP, No. 3:17-CV-407, 2018 WL 3451390, at *4 (E.D. Va. July 17, 2018)
- Campbell v. StoneMor Partners, LP, 752 F. App'x 166 (4th Cir. 2019)
- Saunders v. Jividen, No. 2:21-CV-00250, 2024 WL 3307849, at *7 (S.D. W. Va. May 24, 2024)
- Cochran v. Morris, 73 F.3d 1310, 1318 (4th Cir. 1996)

- Saunders v. Jividen, No. 2:21-CV-00250, 2024 WL 2974378 (S.D. W. Va. June 13, 2024)
- Johnson v. Silvers, 742 F.2d 823, 825 (4th Cir. 1984)
- Swierkiewicz v. Sorema N. A., 534 U.S. 506, 512 (2002)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Young v. City of Mt. Ranier, 238 F.3d 567, 572 (4th Cir. 2001)
- Crysen/Montenay Energy Co. v. Shell Oil Co., 226 F.3d 160, 162 (2d Cir. 2000)

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