

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Jenna Amacher v. Tullahoma Housing Authority, et al.

Case No. 4:25-cv-13 · No. 4:25-cv-00013 · Decided April 30, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee ruled on a motion for judgment on the pleadings filed by Ray Knowis and the City of Tullahoma in Jenna Amacher’s action arising from the termination of her interim executive-director employment with the Tullahoma Housing Authority. The court dismissed the First Amendment retaliation and conspiracy claim against the City, but allowed those claims against Knowis in his individual capacity and allowed Amacher’s tortious-interference-with-contract claim against Knowis to proceed. The court also declined to grant Knowis qualified immunity at this stage.

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	April 30, 2026
DOCKET	4:25-cv-00013
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Ray Knowis and the City of Tullahoma moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	A Rule 12(c) motion is evaluated under the same standard as a Rule 12(b)(6) motion. The court accepts well-pleaded factual allegations as true, construes the complaint in the plaintiff’s favor, and asks whether the complaint states a plausible claim for relief. Legal conclusions and conclusory allegations are not entitled to the presumption of truth.
PRECEDENTIAL VALUE	unpublished

TOPICS

motion for judgment on the pleadings

section 1983

first amendment

qualified immunity

municipal liability

PRACTICE AREAS

civil rights

constitutional law

civil procedure

employment law

contracts

QUESTIONS PRESENTED

1. Whether Amacher plausibly pleaded First Amendment retaliation and conspiracy claims against Knowis and the City.
2. Whether Knowis was entitled to qualified immunity at the judgment-on-the-pleadings stage.
3. Whether Amacher adequately pleaded municipal liability against the City under Monell.
4. Whether Amacher plausibly pleaded tortious interference with contract against Knowis.
5. Whether Knowis was entitled to qualified immunity on the state-law tortious-interference claim.

HOLDINGS

1. Amacher plausibly alleged First Amendment retaliation because she alleged protected speech, an adverse action in the form of termination, and facts supporting an inference that refusal to dismiss her prior lawsuit was a motivating factor in the termination.
2. Amacher plausibly alleged a Section 1983 conspiracy against Knowis by alleging a shared plan and conspiratorial objective to suppress her protected lawsuit, along with overt acts that injured her.
3. Knowis was not entitled to qualified immunity on the First Amendment retaliation and conspiracy claims at the judgment-on-the-pleadings stage.
4. Amacher failed to state a First Amendment claim against the City because she did not plausibly allege that Knowis was a final policymaker with authority over her Housing Authority employment or that a City policy or custom was the moving force behind the alleged violation.
5. Amacher plausibly pleaded tortious interference with contract against Knowis.
6. Knowis was not entitled to qualified immunity on Amacher's state-law tortious-interference claim.

KEY QUOTATIONS

“Plaintiff adequately alleges a First Amendment retaliation and conspiracy claim against Knowis.” (III.A.i)

“Thus, while Plaintiff adequately states a First Amendment claim against Knowis in his individual capacity, she does not state claim against the City.” (III.A.iii)

“Plaintiff’s First Amendment retaliation and conspiracy claim against the City is DISMISSED WITH PREJUDICE. Plaintiff’s First Amendment retaliation and conspiracy claim against Knowis in his individual capacity remains. Plaintiff’s tortious-interference-with-contract claim against Knowis also remains.” (IV)

FACTUAL BACKGROUND

Amacher alleged that she was hired as Interim Executive Director of the Tullahoma Housing Authority under a 130-day employment contract. She alleged that Mayor Ray Knowis and several Housing Authority commissioners repeatedly sought to induce her to dismiss a prior civil-rights lawsuit against Knowis and the City. After she refused, the commissioners allegedly voted to terminate her employment 57 days into the contract. She asserted First Amendment retaliation and conspiracy claims, a tortious-interference claim, breach of contract, and a Tennessee Open Meetings Act claim.

PROCEDURAL HISTORY

Amacher filed this action asserting First Amendment retaliation and conspiracy claims against the City, the Tullahoma Housing Authority, and several individuals, as well as state-law tortious-interference and contract claims. Knowis and the City moved for judgment on the pleadings. The court granted the motion in part, dismissing the First Amendment retaliation and conspiracy claim against the City with prejudice, but denied the motion as to Knowis's individual-capacity federal claim and the tortious-interference claim against Knowis.

DISPOSITION

other

CASES CITED

- United Food & Commercial Workers, Local 1995 v. Kroger Co., 51 F.4th 197, 202 (6th Cir. 2022)
- Moderwell v. Cuyahoga County, 997 F.3d 653, 659 (6th Cir. 2021)
- Ashcroft v. Iqbal, 556 U.S. 662, 679 (2009)
- Papasan v. Allain, 478 U.S. 265, 286 (1986)
- Saalim v. Walmart, Inc., 97 F.4th 995, 1002 (6th Cir. 2024)
- Hardy v. Fisher, 618 F. Supp. 3d 671, 692 (M.D. Tenn. 2022)
- Hensley v. Gassman, 693 F.3d 681, 695 (6th Cir. 2012)
- Bazzi v. City of Dearborn, 658 F.3d 598, 602 (6th Cir. 2011)
- Robertson v. Lucas, 753 F.3d 606, 622 (6th Cir. 2014)
- Siefert v. Hamilton County, 951 F.3d 753, 768 (6th Cir. 2020)
- Rudd v. City of Norton Shores, 977 F.3d 503, 514, 517 (6th Cir. 2020)
- Lemaster v. Lawrence County, 65 F.4th 302, 307, 309 (6th Cir. 2023)
- Handy-Clay v. City of Memphis, 695 F.3d 531, 545 (6th Cir. 2012)
- See v. City of Elyria, 502 F.3d 484, 494-95 (6th Cir. 2007)
- DeVooght v. City of Warren, 157 F.4th 893, 898, 902-03 (6th Cir. 2025)
- Fritz v. Charter Township, 592 F.3d 718, 724 (6th Cir. 2010)
- William Powell Co. v. Ocean Marine Insurance Co. Ltd., No. 25-3322, 2026 WL 555576, at *4 (6th Cir. Feb. 27, 2026)
- Rieves v. Town of Smyrna, 67 F.4th 856, 863 (6th Cir. 2023)
- Webb v. United States, 789 F.3d 647, 671 (6th Cir. 2015)

- Romero v. City of Lansing, 159 F.4th 1002, 1008 (6th Cir. 2025)
- Buddenberg v. Weisdack, 939 F.3d 732, 741 (6th Cir. 2019)
- Gohl v. Livonia Public Schools School District, 836 F.3d 672, 685 (6th Cir. 2016)
- Heyerman v. County of Calhoun, 680 F.3d 642, 648 (6th Cir. 2012)
- Monell v. Department of Social Services, 436 U.S. 658, 691 (1978)
- White v. Hamilton County, No. 1:23-CV-108, 2025 WL 837318, at *13 (E.D. Tenn. Mar. 17, 2025)
- Helphenstine v. Lewis County, 60 F.4th 305, 323 (6th Cir. 2023)
- Cocchini v. City of Franklin, 785 F. Supp. 3d 273, 301-02 (M.D. Tenn. 2025)
- Board of County Commissioners of Bryan County v. Brown, 520 U.S. 397, 404 (1997)
- Murray v. City of New Buffalo, 708 F. Supp. 3d 1313, 1334-35 (W.D. Mich. 2023)
- Holloway v. Brush, 220 F.3d 767, 773 (6th Cir. 2000)
- Guptill v. City of Chattanooga, 160 F.4th 768, 782 (6th Cir. 2025)
- Burgess v. Fischer, 735 F.3d 462, 479 (6th Cir. 2013)
- Rezult Group, Inc. v. Turkheimer, No. 3:22-CV-00567, 2023 WL 1975239, at *10 (M.D. Tenn. Feb. 13, 2023)
- Hauck Manufacturing Co. v. Astec Industries, Inc., 376 F. Supp. 2d 808, 832 (E.D. Tenn. 2005)
- United Biologics, LLC v. Amerigroup Tennessee, Inc., No. 3:19-CV-180, 2023 WL 11991074, at *1-2 (E.D. Tenn. Apr. 24, 2023)
- Bethune-Cookman University, Inc. v. McLeod, No. 6:22-CV-47-WWB-DAB, 2022 WL 18926797, at *2 (M.D. Fla. Sept. 21, 2022)
- Gavillan-Martinez v. Dixon, No. 3:22CV5734/LAC/ZCB, 2024 WL 1097979, at *7 (N.D. Fla. Jan. 26, 2024)