

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

Terrance Phillips v. Oramadike, et al.

Civil Action No. H-25-01143 · No. H-25-01143 · Decided December 16, 2025

SUMMARY

The Southern District of Texas dismissed Terrance Phillips’s pro se civil action without prejudice for want of prosecution after an order for a more definite statement was returned as undeliverable. The court found that Phillips failed to maintain a current address as required by the local rules and advised that relief could be sought under Federal Rule of Civil Procedure 60(b) upon a proper showing.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	December 16, 2025
DOCKET	H-25-01143
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights action dismissed sua sponte without prejudice for want of prosecution after the plaintiff failed to maintain a current address and failed to respond to an order for a more definite statement.
STANDARD OF REVIEW	A district court may sua sponte dismiss an action for failure to comply with a court order or for failure to prosecute under Federal Rule of Civil Procedure 41(b) and its inherent authority to manage its docket.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- civil procedure
- motion for a more definite statement
- prisoners rights

PRACTICE AREAS

- civil procedure
- prisoner civil rights

QUESTIONS PRESENTED

1. Whether the court could dismiss the action sua sponte for want of prosecution after the plaintiff failed to maintain a current address and failed to comply with an order for a more definite statement.
2. Whether dismissal without prejudice was appropriate under Federal Rule of Civil Procedure 41(b) and the court's inherent docket-management authority.

HOLDINGS

1. A district court may sua sponte dismiss an action for want of prosecution when a pro se plaintiff fails to provide a current valid address and thereby fails to comply with a court order and pursue the action.
2. The action was dismissed without prejudice for want of prosecution, subject to possible relief upon a proper Rule 60(b) showing.

KEY QUOTATIONS

“Therefore, under the inherent powers necessarily vested in a district court to manage its own affairs, this Court determines that dismissal for want of prosecution is appropriate.” (at 1)

“Accordingly, based on the foregoing, the Court ORDERS that this case is DISMISSED without prejudice for want of prosecution.” (at 2)

FACTUAL BACKGROUND

Phillips was confined at the Harris County Jail when he filed the action. The court directed him to provide a more definite statement, but the order was returned because there was no such number associated with the address Phillips had supplied. Phillips did not provide a current, valid address as required by the Southern District of Texas local rules and therefore did not receive or comply with the court's order.

PROCEDURAL HISTORY

Phillips filed a civil action while confined at the Harris County Jail. The court issued an order for a more definite statement on October 10, 2025, but the order was returned as undeliverable on December 8, 2025, because the address provided by Phillips was invalid. After Phillips failed to provide a current address or otherwise pursue the action, the court dismissed the case without prejudice for want of prosecution.

DISPOSITION

dismissed

CASES CITED

- Slack v. McDaniel, 529 U.S. 473, 489 (2000)
- Larson v. Scott, 157 F.3d 1030 (5th Cir. 1998)