

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Baltas v. Chapdelaine

Baltas · No. 3:17-cv-00242-MPS · Decided June 9, 2026

SUMMARY

The United States District Court for the District of Connecticut denied six plaintiffs’ motion under Federal Rule of Civil Procedure 60(b)(6) to vacate summary judgment on their free exercise claims. The court held that their former counsel’s alleged inadequate representation constituted negligence or gross negligence, but not the constructive abandonment or extraordinary circumstances required for relief under Rule 60(b)(6).

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Michael P. Shea
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	June 9, 2026
DOCKET	3:17-cv-00242-MPS
DISPOSITION	other
PROCEDURAL POSTURE	Six plaintiffs moved under Federal Rule of Civil Procedure 60(b)(6) for relief from the prior final summary judgment rejecting their free-exercise claims on qualified-immunity grounds.
STANDARD OF REVIEW	A Rule 60(b)(6) motion is committed to the district court's sound discretion and may be granted only upon a showing of exceptional or extraordinary circumstances.
PRECEDENTIAL VALUE	unpublished
PARTIES	Joe Baltas, Kenyon Joseph Pellot-Castellano, Jason Goode, Noah Gladding, Jose Ortiz, Richard Rice, Phillip Rivera v. Carol Chapdelaine, et al.

TOPICS

- motion for reconsideration
- civil procedure
- prisoners rights
- free exercise clause
- civil rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether alleged negligence, gross negligence, inadequate investigation, and inadequate communication by former counsel constituted constructive abandonment and exceptional circumstances warranting relief from final judgment under Federal Rule of Civil Procedure 60(b)(6).
2. Whether the moving plaintiffs' declarations established that they had intended to pursue individualized free-exercise claims that prior counsel abandoned.

HOLDINGS

1. Negligence or even gross negligence by counsel, without constructive or actual abandonment of the client's case, does not constitute the exceptional circumstances required for relief under Rule 60(b)(6).
2. The moving plaintiffs did not demonstrate exceptional circumstances warranting relief from the prior summary judgment.

KEY QUOTATIONS

“Rule 60(b) is a mechanism for extraordinary judicial relief and may be invoked only if the moving party demonstrates exceptional circumstances.” (Legal Standard)

“For a party to be entitled to such relief, “[their] lawyer’s failures must be so egregious and profound that they amount to the abandonment of the client’s case altogether, either through their physical disappearance or constructive disappearance.”” (Discussion)

FACTUAL BACKGROUND

The plaintiffs were Connecticut Department of Correction inmates housed in Q-Pod, a disciplinary unit at MacDougall-Walker Correctional Institution. Their operative complaint made only conclusory references to denial of access to religious services, and their summary-judgment submissions did not develop individualized free-exercise claims for most plaintiffs. The moving plaintiffs asserted that their former attorney failed to investigate their religious beliefs, present evidence, and keep them informed, but their declarations largely did not show that they had specifically asked counsel to pursue free-exercise claims.

PROCEDURAL HISTORY

The plaintiffs sued prison officials over conditions in a disciplinary housing unit and asserted, among other claims, violations of the First Amendment. Judge Robert Chatigny granted summary judgment for the defendants on the federal claims, addressing the free-exercise claims of Joe Baltas and Peter Tarasco and holding that the defendants were entitled to qualified immunity. The Second Circuit reversed as to Baltas and Tarasco, concluding that their right to participate in the relevant congregate religious services was clearly established. After remand, six other plaintiffs sought to vacate the prior judgment under Rule 60(b)(6), asserting that their attorney had constructively abandoned their free-exercise claims. The district court denied the motion.

DISPOSITION

other

CASES CITED

- *Baltas v. Chapdelaine*, 153 F.4th 328, 332–334 (2d Cir. 2025)
- *Felton v. Loc. Union 804, Int'l Bhd. of Teamsters*, No. 22-2779-cv, 2024 WL 2813896, at *2 (2d Cir. June 3, 2024)
- *Stevens v. Miller*, 676 F.3d 62, 67 (2d Cir. 2012)
- *Harris v. U.S.*, 367 F.3d 74, 81 (2d Cir. 2004)
- *Klipsch Grp., Inc. v. Shenzhen Sosound*, No. 11-cv-9187, 2013 WL 1387061, at *3 n.4 (S.D.N.Y. Apr. 5, 2013)
- *United States v. Ciraami*, 563 F.2d 26, 29, 33–35 (2d Cir. 1977)
- *P.T. Busana Idaman Nurani v. Marissa by GHR Indus. Trading Corp.*, 151 F.R.D. 32, 33–35 (S.D.N.Y. 1993)
- *Ituarte by Ituarte v. Chevrolet Motor Div., General Motors Corp.*, No. 86-cv-2843, 1989 WL 10562, at *2–3 (E.D.N.Y. Feb. 2, 1989)

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