

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, EASTERN DIVISION

Mariah Lynn Whynot, Intellectually Challenged Individual by and
Through Next Friend Carrie Shurtleff v. Terri Lee St. Hilaire, et al.

Whynot v. St. Hilaire · No. No. 25-1190-STA-jay · Decided March 31, 2026

SUMMARY

The United States District Court for the Western District of Tennessee adopts the Magistrate Judge’s recommendation to dismiss sua sponte a pro se petition and related claims. The court concludes that Carrie Shurtleff lacks standing to assert claims on behalf of Mariah Lynn Whynot, that the federal claims arising in Florida are improperly venued, and that a request for appointment as guardian or conservator belongs in Tennessee state court. The court also certifies that any appeal would not be taken in good faith and denies leave to proceed in forma pauperis on appeal.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee, Eastern Division
WRITING FOR THE COURT	S. Thomas Anderson
JURISDICTION	United States District Court for the Western District of Tennessee, Eastern Division
DECIDED	March 31, 2026
DOCKET	No. 25-1190-STA-jay
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation recommending sua sponte dismissal of a pro se petition for a writ of habeas corpus and related claims. After reviewing the plaintiff's objections, the district court adopted the report and recommendation, dismissed all claims, denied pending motions, and certified that any appeal would not be taken in good faith.
STANDARD OF REVIEW	The district court reviews a magistrate judge's report and recommendation de novo as to portions to which a proper, timely objection is made. Vague, general, or conclusory objections do not trigger de novo review of the challenged issue. The court nevertheless reviewed the report and recommendation in the interest of fairness.

TOPICS

federal habeas corpus

standing

venue

guardianship procedure

appellate procedure

PRACTICE AREAS

federal habeas corpus

civil procedure

guardianship procedure

appellate procedure

civil rights

QUESTIONS PRESENTED

1. Whether the magistrate judge's report and recommendation should be adopted despite the plaintiff's vague, general, and conclusory objections.
2. Whether Shurtleff had standing to assert claims on Whynot's behalf without being Whynot's legal representative or guardian.
3. Whether the federal civil-rights claims arising from events in Florida were properly brought in the Western District of Tennessee.
4. Whether the federal district court was the proper forum for a request to appoint Shurtleff as Whynot's guardian or conservator.
5. Whether any appeal should be certified as not taken in good faith for purposes of proceeding in forma pauperis.

HOLDINGS

1. Vague, general, or conclusory objections do not satisfy the requirement for specific objections and waive de novo review of the affected portions of a report and recommendation.
2. A person who is not the alleged ward's legal representative or guardian lacks standing to bring claims on the ward's behalf.
3. The Western District of Tennessee was not the proper forum for civil-rights claims based on alleged conduct occurring in Florida; venue was governed by 28 U.S.C. § 1391, and dismissal rather than transfer was appropriate because the claims belonged in Florida.
4. A request to appoint a guardian or conservator of a Tennessee resident must be pursued in a Tennessee state court exercising probate jurisdiction or another proper state court, not in this federal habeas action.
5. An appeal would not be taken in good faith when the same considerations requiring dismissal of the complaint show that the appeal presents no nonfrivolous issue.

KEY QUOTATIONS

“Simply put, Ms. Shurtleff is not the legal representative or guardian of Ms. Whynot and, thus, lacks standing to bring claims on her behalf.”

“It is CERTIFIED, pursuant to Fed. R. App. P. 24(a), that any appeal in this matter by Ms. Shurtleff is not taken in good faith.”

FACTUAL BACKGROUND

Shurtleff filed claims on behalf of Whynot, an intellectually challenged individual, alleging breach of fiduciary duty, extortion, abuse, neglect, and due-process violations involving conduct that allegedly occurred in Florida. Shurtleff and Whynot were alleged to reside in the Western District of Tennessee, but Shurtleff was not Whynot's legal representative or guardian. Shurtleff also appeared to seek appointment as Whynot's Tennessee guardian or conservator.

PROCEDURAL HISTORY

Carrie Shurtleff filed a pro se petition on behalf of Mariah Lynn Whynot under 28 U.S.C. § 2241, apparently also asserting civil-rights and Tennessee guardianship-related claims. The magistrate judge recommended sua sponte dismissal for failure to state a claim and because Shurtleff was not Whynot's legal representative or guardian and therefore lacked standing. The district court overruled the objections, adopted the recommendation, dismissed the claims, denied pending motions, and denied leave to proceed in forma pauperis on appeal.

DISPOSITION

dismissed

CASES CITED

- Bates v. Ohio Department of Rehabilitation & Correction, 2023 WL 4348835, at *1 (S.D. Ohio July 5, 2023)
- Miller v. Currie, 50 F.3d 373, 380 (6th Cir. 1995)
- Cole v. Yukins, 2001 WL 303507, at *1 (6th Cir. Mar. 19, 2001)
- Howard v. Secretary of Health & Human Services, 932 F.2d 505, 509 (6th Cir. 1991)
- In re Conservatorship of Ackerman, 280 S.W.3d 206, 210 (Tenn. Ct. App. 2008)
- Callihan v. Schneider, 178 F.3d 800, 803-04 (6th Cir. 1999)
- Coppedge v. United States, 369 U.S. 438, 445 (1962)
- Williams v. Kullman, 722 F.2d 1048, 1050 n. 1 (2d Cir. 1983)