

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, SOUTHEASTERN DIVISION

Kendrick L. Brown v. Unknown Wilson

Brown v. Unknown Wilson · No. 1:25-cv-127-ACL · Decided February 11, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri dismissed Kendrick L. Brown’s civil rights action against an unidentified Butler County police officer without prejudice. The dismissal was based on Plaintiff’s failure to comply with an order directing him to file an amended complaint and his failure to prosecute, pursuant to Federal Rule of Civil Procedure 41(b).

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	February 11, 2026
DOCKET	1:25-cv-127-ACL
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court sua sponte dismissed the civil-rights action without prejudice after Plaintiff failed to file an amended complaint as ordered and failed to prosecute the case.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; nonprecedential.
PARTIES	Kendrick L. Brown v. Unknown Wilson

TOPICS

- civil procedure
- section 1983
- pleadings

PRACTICE AREAS

- civil procedure
- civil rights

QUESTIONS PRESENTED

- Whether the district court could dismiss the action sua sponte and without prejudice under Federal Rule of Civil Procedure 41(b) for Plaintiff’s failure to comply with a court order and failure to prosecute.

HOLDINGS

1. A district court may dismiss an action sua sponte and without prejudice under Federal Rule of Civil Procedure 41(b) when the plaintiff fails to comply with a court order and fails to prosecute after receiving meaningful notice, a clear warning of dismissal, and adequate time to comply.

KEY QUOTATIONS

“by the control necessarily vested in courts to manage their own affairs so as to achieve the orderly and expeditious disposition of cases” (at 2)

FACTUAL BACKGROUND

Kendrick L. Brown alleged that a Butler County police officer violated his civil rights. The district court determined that his complaint was defective and directed him to file an amended complaint. Despite receiving notice of the required action, a specific deadline, and a warning that noncompliance would result in dismissal, Brown did not respond or seek an extension.

PROCEDURAL HISTORY

Plaintiff commenced the action on August 5, 2025, alleging civil-rights violations by a Butler County police officer. The court granted leave to proceed without prepaying fees or costs, found the complaint defective, and ordered Plaintiff to file an amended complaint by January 5, 2026, warning that failure to comply would result in dismissal. Plaintiff neither responded nor requested additional time, so the court dismissed the action without prejudice.

DISPOSITION

dismissed

CASES CITED

- Link v. Wabash R.R. Co., 370 U.S. 626, 630-31 (1962)
- Brown v. Frey, 806 F.2d 801, 803 (8th Cir. 1986)