

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Joshua Harrell v. Andrew Coop, et al.

Civ. No. MJM-24-104 (D. Md. Mar. 30, 2026) · No. Civ. No. MJM-24-104 · Decided March 30, 2026

SUMMARY

The United States District Court for the District of Maryland considers Defendants’ motion to dismiss a pro se plaintiff’s 42 U.S.C. § 1983 claims arising from disciplinary proceedings at the University of Maryland School of Pharmacy. The court addresses Eleventh Amendment immunity, including the Ex parte Young exception, and grants Defendants’ motion to dismiss while denying Plaintiff’s motion for sanctions.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Matthew J. Maddox
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 30, 2026
DOCKET	Civ. No. MJM-24-104
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the Second Amended Complaint, and the plaintiff moved for Rule 11 sanctions. The district court granted the motion to dismiss, denied sanctions, and dismissed the Second Amended Complaint without prejudice.
STANDARD OF REVIEW	For Rule 12(b)(6), the court applied the plausibility standard under Bell Atlantic Corp. v. Twombly and Ashcroft v. Iqbal, generally considering the complaint, incorporated documents, exhibits, and authenticated documents integral to the complaint. The court treated the Eleventh Amendment issue as a facial Rule 12(b)(1) challenge and accepted the pleaded facts as true. Rule 11 sanctions were evaluated under an objective factual-basis standard and reviewed as a matter within the court's discretion.
PRECEDENTIAL VALUE	unpublished district court opinion; nonprecedential

TOPICS

section 1983

eleventh amendment immunity

qualified immunity

first amendment

motions to dismiss

PRACTICE AREAS

civil rights

constitutional law

federal courts

education law

civil procedure

QUESTIONS PRESENTED

1. Whether the individual defendants were immune under the Eleventh Amendment from official-capacity claims under 42 U.S.C. § 1983.
2. Whether qualified immunity barred individual-capacity claims for damages based on the defendants' initiation of disciplinary proceedings in response to alleged disruptive student conduct.
3. Whether the plaintiff's requests for injunctive and declaratory relief were moot or otherwise unavailable after the plaintiff stopped attending the university and the disciplinary process was halted.
4. Whether the defendants' alleged factual discrepancies in motion papers warranted sanctions under Federal Rule of Civil Procedure 11.

HOLDINGS

1. The individual defendants were immune under the Eleventh Amendment from the plaintiff's § 1983 claims to the extent they were sued in their official capacities, and those claims had to be dismissed for lack of subject matter jurisdiction.
2. Qualified immunity barred the plaintiff's individual-capacity claims for monetary relief because the alleged disciplinary actions did not violate a clearly established First Amendment right.
3. The plaintiff's request for injunctive relief was moot, and declaratory relief was improper because there was no continuing violation, damages were unavailable, and the request for injunctive relief was moot.
4. The plaintiff was not entitled to Rule 11 sanctions because the challenged discrepancies in the defendants' filings were minor and did not establish that the factual assertions lacked an objective factual basis.

KEY QUOTATIONS

“For the foregoing reasons, it is by the United States District Court for the District of Maryland hereby ORDERED that Defendants’ Motion to Dismiss (ECF No. 35) is GRANTED, and Plaintiff’s Motion for Sanctions (ECF No. 47) is DENIED.” (Order)

“And it is further ORDERED that Plaintiff’s Second Amended Complaint is dismissed without prejudice.” (Order)

“Qualified immunity shields government officials performing discretionary functions from personal-capacity liability for civil damages under § 1983, insofar as their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known.” (Section III.C)

FACTUAL BACKGROUND

Plaintiff was a first-year doctoral student at the University of Maryland School of Pharmacy during the fall of 2023. University personnel documented several incidents involving alleged disruptive, off-topic, or socially inappropriate conduct in classes and university events, including an off-topic question, disruptive nose-blowing, contentious interactions with professors, and questions or comments perceived as confusing or disruptive. A university grievance was filed under the Student Honor Code, and a disciplinary hearing was scheduled. Plaintiff alleged that initiating and maintaining the disciplinary process violated the First Amendment and sought damages, injunctive relief, and declaratory relief.

PROCEDURAL HISTORY

Plaintiff filed the action on January 11, 2024, and later amended the pleadings twice. The Second Amended Complaint alleged First Amendment violations under 42 U.S.C. § 1983 arising from a university disciplinary process. The University of Maryland School of Pharmacy was voluntarily dismissed, while the individual defendants remained. Plaintiff did not file a substantive response to the motion to dismiss. The court dismissed the claims against the individual defendants and closed the case.

DISPOSITION

dismissed

CASES CITED

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Goines v. Valley Cmty. Servs. Bd., 822 F.3d 159, 165-66 (4th Cir. 2016)
- Pueschel v. United States, 369 F.3d 345, 354 (4th Cir. 2004)
- Pense v. Md. Dep't of Pub. Safety & Corr. Servs., 926 F.3d 97, 100 (4th Cir. 2019)
- Port Auth. Trans-Hudson Corp. v. Feeney, 495 U.S. 299, 304 (1990)
- Regents of the Univ. of Cal. v. Doe, 519 U.S. 425, 429 (1997)
- Palotai v. Univ. of Md. Coll. Park, 959 F. Supp. 714, 716 (D. Md. 1997)
- Lee-Thomas v. Prince George's Cnty. Pub. Schs., 666 F.3d 244, 249, 252 (4th Cir. 2012)
- Ex parte Young, 209 U.S. 123, 167 (1908)
- Talley v. Folwell, 133 F.4th 289, 298 (4th Cir. 2025)
- Republic of Paraguay v. Allen, 134 F.3d 622, 628 (4th Cir. 1998)
- Will v. Mich. Dep't of State Police, 491 U.S. 58, 70-71 (1989)
- MedSense, LLC v. Univ. Sys. of Md., 420 F. Supp. 3d 382, 393, 395 (D. Md. 2019)
- Davison v. Rose, 19 F.4th 626, 640 (4th Cir. 2021)
- Healy v. James, 408 U.S. 169, 180, 192-93 (1972)
- Tinker v. Des Moines Indep. Cmty. Sch. Dist., 393 U.S. 503, 507 (1969)
- Hardwick ex rel. Hardwick v. Heyward, 711 F.3d 426, 444 (4th Cir. 2013)
- Newsom ex rel. Newsom v. Albemarle Cnty. Sch. Bd., 354 F.3d 249, 258 (4th Cir. 2003)

- Karp v. Becken, 477 F.2d 171, 175 (9th Cir. 1973)
- Thompson v. Commonwealth of Virginia, 878 F.3d 89, 98 (4th Cir. 2017)
- Carolina Youth Action Project; D.S. by & through Ford v. Wilson, 60 F.4th 770, 792 (4th Cir. 2023)
- Green v. Mansour, 474 U.S. 64, 73 (1985)
- American Humanist Ass'n v. Greenville Cnty. Sch. Dist., 652 F. App'x 224, 228-31 (4th Cir. 2016)
- Columbia Gas Transmission, LLC v. Haas, Civ. No. 22-1504, 2023 WL 4787441, at *4 (4th Cir. July 27, 2023)
- Chaplin v. Du Pont Advance Fiber Sys., 124 F. App'x 771, 774 (4th Cir. 2005)
- In re Kunstler, 914 F.2d 505, 516 (4th Cir. 1990)
- Southmark Inv. Grp. 86, Inc. v. Turner Dev. Corp., 140 F.R.D. 1, 3 (M.D. Fla. 1991)
- Sansone v. Kormex Metal Craft, Inc., No. 14 C 8418, 2016 WL 1529900, at *7 (N.D. Ill. Apr. 14, 2016)
- Scott v. Lori, Civ. No. ELH-19-2014, 2020 WL 906351, at *2 (D. Md. Feb. 24, 2020)