

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Samantha D. Rajapakse v. Clarence H. Carter, Commissioner of
Tennessee Department of Human Services, et al.

No. 3:25-cv-00188 (M.D. Tenn. Jan. 16, 2026) · No. No. 3:25-cv-00188 · Decided January 16, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee grants Samantha D. Rajapakse leave to proceed in forma pauperis and conducts the required initial review of her civil-rights complaint. The court allows her ADA discrimination and retaliation claims against the Tennessee Department of Human Services and its commissioner to proceed, including claims involving her termination, an unresolved EEOC conciliation agreement, disability-benefit proceedings, and vocational rehabilitation. The court also grants her motion to supplement the complaint, directs service, and refers the action for further proceedings.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Judge Campbell
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	January 16, 2026
DOCKET	No. 3:25-cv-00188
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed a pro se civil-rights complaint against the Tennessee Department of Human Services and its Commissioner, together with an application to proceed in forma pauperis. She later moved to supplement the complaint. The district court granted pauper status, granted supplementation in part, denied the request for partial summary judgment, and conducted initial screening under 28 U.S.C. § 1915(e)(2)(B).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis complaint that is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an

immune defendant. In assessing failure to state a claim, the court applies the Rule 12(b)(6) plausibility standard, accepts well-pleaded factual allegations and reasonable inferences as true, does not accept legal conclusions or unwarranted factual inferences as true, and liberally construes a pro se pleading.

PRECEDENTIAL VALUE

nonprecedential

TOPICS

motion to amend

ada / disability

retaliation

employment discrimination

civil procedure

PRACTICE AREAS

civil procedure

civil rights

employment law

disability discrimination

administrative law

QUESTIONS PRESENTED

1. Whether Rajapakse qualified to proceed in forma pauperis under 28 U.S.C. § 1915(a).
2. Whether the motion to supplement the complaint was proper under Federal Rule of Civil Procedure 15(d).
3. Whether the complaint and supplemental allegations stated plausible ADA discrimination and retaliation claims sufficient to survive initial screening under 28 U.S.C. § 1915(e)(2)(B).
4. Whether the court could award partial summary judgment at the early stage of the proceedings.

HOLDINGS

1. Plaintiff may proceed in forma pauperis because her financial disclosures support the finding that she cannot pay the civil filing fee without undue hardship.
2. The motion to supplement the complaint is granted insofar as it seeks to add events occurring after the original complaint.
3. The complaint and supplement sufficiently plead ADA discrimination and retaliation claims to survive initial review and proceed for further development of the record.
4. Plaintiff's request for partial summary judgment is denied because the case is at an early stage and requires further development of the record.
5. The action is not dismissed at initial screening because Plaintiff's allegations are sufficiently pleaded.

KEY QUOTATIONS

"These claims will be allowed to proceed for further development of the record, including clarification of the status of enforcement proceedings before the EEOC and/or the Attorney General since the filing of the Complaint and Supplement." (C. Analysis)

"Plaintiff's Motion to Supplement Complaint (Doc. No. 11), which also seeks "to expedite proceedings" and to be awarded "partial summary judgment" (id. at 1), is GRANTED insofar as it seeks to supplement the

FACTUAL BACKGROUND

Rajapakse, an African-American employee over age forty with a disability, worked for the Tennessee Department of Human Services until her termination on August 28, 2023. She alleged that the termination followed her request for accommodations under the Americans with Disabilities Act and her complaints about the handling of SNAP-benefit claims. She filed an EEOC charge and received a reasonable-cause determination, but alleged delays in finalizing a proposed conciliation agreement, denial of a Social Security disability claim, and interference with vocational rehabilitation services.

PROCEDURAL HISTORY

Rajapakse alleged that the Tennessee Department of Human Services terminated her employment after she requested disability accommodations and reported concerns about SNAP claims handling. She also alleged delays involving an EEOC conciliation agreement, denial of a disability claim, and interference with vocational rehabilitation. The court granted in forma pauperis status, permitted the supplemental allegations, found the ADA discrimination and retaliation claims sufficiently pleaded to survive initial review, directed issuance of service packets, and referred the action to a magistrate judge for service and further pretrial proceedings.

DISPOSITION

other

CASES CITED

- *Foster v. Cuyahoga Dep't of Health and Human Servs.*, 21 F. App'x 239, 240 (6th Cir. 2001)
- *Ongori v. Hawkins*, No. 16-2781, 2017 WL 6759020, at *1 (6th Cir. Nov. 15, 2017)
- *Small v. Brock*, 963 F.3d 539, 540 (6th Cir. 2020)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Hill v. Lappin*, 630 F.3d 468, 470-71 (6th Cir. 2010)
- *Nat'l Rifle Ass'n of Am. v. Vullo*, 602 U.S. 175, 181 (2024)
- *Inner City Contracting, LLC v. Charter Twp. of Northville, Michigan*, 87 F.4th 743, 749 (6th Cir. 2023)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *EEOC v. Frank's Nursery & Crafts, Inc.*, 177 F.3d 448, 456 (6th Cir. 1999)
- *Logan v. MGM Grand Detroit Casino*, 939 F.3d 824, 828 (6th Cir. 2019)
- *Diggs v. Potter*, 700 F. Supp. 2d 20, 39-40 (D.D.C. 2010)
- *Kostic v. United Parcel Serv., Inc.*, 532 F. Supp. 3d 513, 542 (M.D. Tenn. 2021)