

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Joshua Chronicles v. Loyola University New Orleans, et al.

Civil Action No. 25-2211, Section I (5) · No. 25-2211 · Decided December 8, 2025

SUMMARY

The United States District Court for the Eastern District of Louisiana denied without prejudice Joshua Chronicles’s motion to reconsider the denial of appointed counsel. The court held that no new circumstances or information justified reconsideration and preserved the plaintiff’s ability to renew the request after the court reviews his ADA-related medical documentation.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Michael B. North
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	December 8, 2025
DOCKET	25-2211
DISPOSITION	denied
PROCEDURAL POSTURE	Motion for reconsideration of order denying appointment of counsel in a pro se civil rights case.
PRECEDENTIAL VALUE	non_precedential

TOPICS

- motion for reconsideration
- civil rights
- civil procedure
- section 1983

PRACTICE AREAS

- civil rights
- civil procedure

QUESTIONS PRESENTED

- Whether reconsideration of the denial of appointment of counsel is warranted based on new circumstances, overlooked material facts, or the interests of justice.

HOLDINGS

1. Reconsideration is denied because the plaintiff has not established that reconsideration is proper, as there has been no further development in the case and no new circumstances have arisen since the prior order.

KEY QUOTATIONS

“Motions to reconsider 'serve the narrow purpose of allowing a party to correct manifest errors of law or fact or to present newly discovered evidence.'”

“They are not the proper vehicle for rehashing evidence, legal theories, or arguments.”

“When there exists no independent reason for reconsideration other than mere disagreement with a prior order, reconsideration is a waste of judicial time and resources and should not be granted.”

“There is no Sixth Amendment right to counsel in a civil case, so the court may not appoint counsel as a matter of course or ordinary practice.”

“Counsel should be appointed only upon a showing of 'exceptional circumstances' based on a consideration of the type and complexity of the case, the litigant's ability to investigate and present the case adequately, and the level of skill required to present the evidence.”

FACTUAL BACKGROUND

Plaintiff, proceeding pro se and in forma pauperis, filed civil rights claims under 42 U.S.C. § 1983, Title VI, Title IX, and the First Amendment against Loyola University New Orleans, alleging retaliation, racial and religious discrimination, and procedural due process violations. He moved for appointment of counsel due to case complexity and his own medical/psychological limitations. The Court denied the motion without prejudice, allowing re-urging after further case development. Plaintiff then filed the instant motion for reconsideration, claiming new circumstances and material facts.

PROCEDURAL HISTORY

Plaintiff filed a civil rights action on October 29, 2025. After the Court denied his amended motion to appoint counsel, Plaintiff filed a motion for reconsideration three days later, which is the subject of this order.

DISPOSITION

denied

CASES CITED

- Cressionnie v. Hample, 184 F. App'x 366 (5th Cir. 2006)
- Shepherd v. Int'l Paper Co., 372 F.3d 326 (5th Cir. 2004)
- Waltman v. Int'l Paper Co., 875 F.2d 468 (5th Cir. 1989)
- Simon v. United States, 891 F.2d 1154 (5th Cir. 1990)
- Livingston Downs Racing Ass'n, Inc. v. Jefferson Downs Corp., 259 F. Supp. 2d 471 (M.D. La. 2002)
- Hadd v. LSG-Sky Chefs, 272 F.3d 298 (5th Cir. 2001)

- Encalade v. Biggs, 2023 WL 7398221 (E.D. La. Oct. 12, 2023)

OPINION

Chronicles

PER CURIAM.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

JOSHUA CHRONICLES CIVIL ACTION

VERSUS NUMBER: 25-2211

LOYOLA UNIVERSITY NEW ORLEANS, ET AL. SECTION: "I" (5)

ORDER AND REASONS

Before the Court is the Motion for Reconsideration of Order Denying Appointment of Counsel (rec. doc. 18) filed by pro se and in forma pauperis (rec. doc. 3) Plaintiff Joshua Chronicles ("Plaintiff"). Having reviewed the pleading and the case law, the Court rules as follows. I. Background On October 29, 2025, Plaintiff filed claims under 42 U.S.C. § 1983, Title VI, Title IX, and the First Amendment, arising from retaliation, racial and religious discrimination, and procedural due process violations by Loyola University New Orleans ("Loyola") personnel. (Rec. doc. 1). Plaintiff then filed an Amended Motion to Appoint Counsel (rec. doc 13) requesting appointment of counsel due to the alleged legal complexity of his case, the constitutional issues, and Plaintiff's current medical and psychological limitations. (Rec. doc. 13). This Court denied Plaintiffs Amended Motion to Appoint Counsel while reserving his right to raise this request at a later time. (Rec. doc. 16). The Court explained that should circumstances arise after further development in this case making the appointment of counsel clearer, Plaintiff reserved the right to move for the Court to do so. (Id.). Three days later, Plaintiff filed his motion for reconsideration. (Rec. doc. 18). He claims reconsideration is warranted due to new circumstances, lack of considering material facts, and due to the interests of justice. (Id.). II. Law and Analysis The Federal Rules of Civil Procedure do not provide specifically for motions for reconsideration. *Cressionnie v. Hample*, 184 F. App'x 366, 369 (5th Cir. 2006); *Shepherd v. Int'l Paper Co.*, 372 F.3d 326, 328 (5th Cir. 2004). Whether analyzed under Rule 54(b), Rule 59(e) or Rule 60(b), motions to reconsider "serve the narrow purpose of allowing a party to correct manifest errors of law or fact or to present newly discovered evidence." *Waltman v. Int'l Paper Co.*, 875 F.2d 468, 473 (5th Cir. 1989). They are not the proper vehicle for rehashing evidence, legal theories, or arguments. *Simon v. United States*, 891 F.2d 1154, 1159 (5th Cir. 1990). When there exists no independent reason for reconsideration other than mere disagreement with a prior order, reconsideration is a waste of judicial time and resources and should not be granted. *Livingston Downs Racing Ass'n, Inc. v. Jefferson Downs Corp.*, 259 F. Supp. 2d 471, 475 (M.D. La. 2002). Plaintiff has not established that reconsideration is proper. He has misconstrued the Courts order (rec. doc. 18) stating that reconsideration may be warranted only after further development in this

case. There has been no further development. Plaintiff has not provided the Court with any additional information that has not already been considered. Relevant motions that may warrant reconsideration such as Plaintiffs Motion for Ada/Rehabilitation Act Accommodations and Request to File Medical Documents Under Seal (Rec. doc. 17) and the Motion to Seal Prior and Future Medical, Disability, and VA-related Filings (Rec. doc. 20) have been dismissed as premature. (Rec. doc. 36). Therefore, no new circumstances have arisen for the Courts review. As this Court has p'reviously explained, there is no Sixth Amendment right to counsel in a civil case, so the court may not appoint counsel as a matter of course or ordinary practice. *Hadd v, LSG-Sky Chefs*, 272 F.3d 298, 301 (5th Cir. 2001). Counsel should be appointed only upon a showing of "exceptional circumstances" based on a consideration of the type and complexity of the case, the litigant's ability to investigate and present the case adequately, and the level of skill required to present the evidence. *Encalade v. Biggs*, 2023 WL 7398221 (E.D. La. Oct. 12, 2023). The Court has already taken these factors into consideration with its order denying appointment. (See rec. doc. 16). With no further development in the case, reconsideration is not proper at this time. III. Conclusion Accordingly, and for the foregoing reasons, IT IS ORDERED that Plaintiff's Motion for Reconsideration of Order Denying Appointment of Counsel (rec. doc. 18) is DENIED WITHOUT PREJUDICE to his right to re- urge his request after completion of the Court's review of Plaintiffs ADA medical documentation. New Orleans, Louisiana, this 8th day of D ecemb er , 2024.

MICHAEL B. NORTH

UNITED STATES MAGISTRATE JUDGE