

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Sanchaz Harold v. Jordan Joshlin, et al.

Harold · No. No. 25-792 · Decided May 15, 2026

SUMMARY

The court construes the plaintiff’s pleading entitled “In Regard to Order” as a motion to amend. The court denies the motion in part as futile and dismisses it in part as moot, explaining that two proposed defendants were no longer parties, one proposed defendant was already named, and the Tangipahoa Parish Jail is not a proper § 1983 defendant.

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	May 15, 2026
DOCKET	No. 25-792
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to amend his complaint to add Sheriff Gerald Sticker and the Tangipahoa Parish Jail as defendants. The court construed a filing entitled “In Regard to Order” as a motion to amend.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

TOPICS

- motion to amend
- section 1983
- prisoners rights
- civil procedure
- ada / disability

PRACTICE AREAS

- civil procedure
- prisoner civil rights
- disability discrimination

QUESTIONS PRESENTED

1. Whether the motion to amend was moot as to Sheriff Gerald Sticker because he was already a named defendant who had appeared through counsel.

2. Whether amendment to add the Tangipahoa Parish Jail as a defendant was futile because the jail is not a proper person or entity subject to suit under 42 U.S.C. § 1983.
3. Whether amendment was necessary to add Jordan Joshlin and Terry Lane when those defendants had already been dismissed without prejudice for failure of service.

HOLDINGS

1. The request to add Jordan Joshlin and Terry Lane was unnecessary because they were no longer defendants after dismissal without prejudice for failure to serve.
2. The request to add Sheriff Gerald Sticker was moot because he was already a named defendant and had appeared through counsel.
3. The Tangipahoa Parish Jail is not a proper defendant in a § 1983 action because it is merely a building or facility and is not a person subject to suit under the statute.

FACTUAL BACKGROUND

Plaintiff, who alleged that he is legally blind, claimed that jail officials failed to accommodate him under the Americans with Disabilities Act and failed to provide adequate protection and medical treatment. He sought, among other things, placement in the jail's medical dormitory and monetary damages. He sought to add Sheriff Gerald Sticker and the Tangipahoa Parish Jail as defendants because he could not provide service addresses for Jordan Joshlin and Terry Lane.

PROCEDURAL HISTORY

Plaintiff filed a pro se action under 42 U.S.C. § 1983 alleging mistreatment and inadequate accommodation and medical care while incarcerated at the Tangipahoa Parish Jail. Three defendants had previously been dismissed without prejudice for failure to serve, and the district court adopted a report and recommendation concerning dismissal of Jordan Joshlin and Terry Lane under Federal Rule of Civil Procedure 4(m). The court denied the motion to amend in part as moot and in part as futile.

DISPOSITION

other

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Johnson v. Tangipahoa Par. Jail, No. CV 21-1698, 2022 WL 1547764, at *5 (E.D. La. Apr. 25, 2022)
- Robinson v. Pinion, No. CV 21-1698, 2022 WL 1540610 (E.D. La. May 16, 2022)
- Coleman v. Terrebonne Parish Criminal Justice Complex, Civ. A. No. 05-6364, 2006 WL 2710443, at *3 (E.D. La. Sept. 19, 2006)
- Coleman v. Terrebonne Parish Criminal Justice Complex, Civ. A. No. 15-5716, 2015 WL 10323883, at *1 n.1 (E.D. La. Dec. 21, 2015)
- C.C. v. City of New Orleans, Civ. A. No. 13-4325, 2013 WL 6004051, at *5 (E.D. La. Nov. 13, 2013)

