

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
LOUISIANA

Maurice Williams v. Town of Clinton, et al.

Williams v. Town of Clinton · No. No. 23-00119-BAJ-RLB · Decided February 24, 2026

SUMMARY

The United States District Court for the Middle District of Louisiana rules on Defendants’ motion for summary judgment in a civil rights action arising from Maurice Williams’s arrest by Officer Charles Brown. The court grants summary judgment on the federal and state false-arrest and malicious-prosecution claims, denies summary judgment on the state-law battery claim, and finds Officer Brown entitled to qualified immunity on the federal excessive-force claim. The excerpt also addresses the parties’ disputed accounts of the arrest and Plaintiff’s state-law defamation claim, but it ends before the defamation analysis and final disposition are complete.

CASE DETAILS

COURT	United States District Court for the Middle District of Louisiana
WRITING FOR THE COURT	Brian A. Jackson
JURISDICTION	United States District Court for the Middle District of Louisiana
DECIDED	February 24, 2026
DOCKET	No. 23-00119-BAJ-RLB
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for summary judgment on federal and state claims arising from Plaintiff's arrest and the force used during the arrest. The court granted the motion in part and denied it in part, granting qualified immunity on the federal excessive-force claim, dismissing several claims, and declining supplemental jurisdiction over the remaining state-law claims.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The evidence of the nonmovant is believed and justifiable inferences are drawn in the nonmovant's favor. For qualified immunity, the plaintiff must establish a violation of clearly established law and a genuine dispute concerning the objective reasonableness of the official's conduct.

PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Maurice Williams v. Town of Clinton, Charles Brown

TOPICS

summary judgment qualified immunity police misconduct false arrest defamation

PRACTICE AREAS

civil rights constitutional torts municipal law torts civil procedure

QUESTIONS PRESENTED

1. Whether the facially valid bench warrant and the absence of evidence that Brown knowingly tainted the issuing judge's decision defeated Williams's federal and state false-arrest claims.
2. Whether the same evidence defeated Williams's federal and state malicious-prosecution claims.
3. Whether disputed facts concerning the arrest altercation precluded summary judgment on the federal excessive-force and state battery claims.
4. Whether Brown was entitled to qualified immunity on the federal excessive-force claim.
5. Whether probable cause for the arrest afforded Brown a qualified privilege defeating Williams's state defamation claim.
6. Whether the court should decline supplemental jurisdiction over the remaining state-law battery and vicarious-liability claims after dismissing the federal claims.

HOLDINGS

1. A facially valid arrest warrant supported the arrest with probable cause, and Williams failed to produce evidence affirmatively showing that Brown knowingly tainted the independent judge's decision by omission or commission. The federal and state false-arrest claims therefore failed.
2. Williams's federal and state malicious-prosecution claims failed because the arrest was supported by a bench warrant and Williams presented no evidence that Brown tainted the state judge's probable-cause determination.
3. Disputed material facts concerning the altercation prevented the court from determining as a matter of law whether Brown's use of force was objectively reasonable. Summary judgment was therefore unavailable on the state battery claim, although Brown was entitled to qualified immunity on the federal excessive-force claim.
4. Brown was entitled to qualified immunity on Williams's federal excessive-force claim because Williams offered only conclusory allegations of malice and failed to establish that Brown violated clearly established law or that genuine factual disputes concerned the objective reasonableness of Brown's conduct under the qualified-immunity standard.

5. Because the arrest was supported by probable cause, Louisiana law afforded Brown a qualified privilege for reports concerning the arrest and charges, defeating Williams's defamation claim.
6. After dismissing all federal claims, the court declined to exercise supplemental jurisdiction over the remaining state-law battery and vicarious-liability claims.

KEY QUOTATIONS

“It is well settled that if facts supporting an arrest are placed before an independent intermediary such as a magistrate or grand jury, the intermediary’s decision breaks the chain of causation for false arrest, insulating the initiating party.” (Section IV.A)

“Because the parties dispute all material facts surrounding the altercation that ensued during Brown’s arrest of Plaintiff, the Court cannot make the “fact intensive” determination of whether Brown’s actions were objectively reasonable as a matter of law on the record before it.” (Section IV.C.i)

FACTUAL BACKGROUND

Officer Charles Brown issued Williams a summons for violating a dogs-at-large ordinance, but the summons contained a disputed and apparently incorrect court date. A state-court judge later issued a bench warrant for Williams's failure to appear. When Brown went to Williams's home to execute the warrant, Williams turned toward the home, asserting that he was trying to get his shoes or alert his granddaughter, while Defendants asserted that he was resisting or attempting to retreat. Brown used hands-on force and pepper spray, and the parties disputed the material circumstances of the altercation.

PROCEDURAL HISTORY

Williams filed suit on February 17, 2023, against Officer Charles Brown and the Town of Clinton. The court previously dismissed false-arrest, defamation, malicious-prosecution, and punitive-damages claims without prejudice to amendment. Williams filed an amended complaint asserting federal false arrest, illegal seizure and excessive force, and malicious prosecution claims, along with state battery, defamation, and malicious prosecution claims. After discovery, Defendants moved for summary judgment; the court granted the motion as to the false-arrest, malicious-prosecution, and defamation claims and as to qualified immunity on the federal excessive-force claim, denied summary judgment on the state battery claim, and declined supplemental jurisdiction over the surviving state-law claims.

DISPOSITION

other

CASES CITED

- *Funches v. Progressive Tractor & Implement Co., L.L.C.*, 905 F.3d 846, 849 (5th Cir. 2018)
- *Int’l Shortstop, Inc. v. Rally’s, Inc.*, 939 F.2d 1257, 1264-65 (5th Cir. 1991)
- *Lujan v. National Wildlife Federation*, 497 U.S. 871, 885 (1990)
- *Giles v. General Electric Co.*, 245 F.3d 474, 493 (5th Cir. 2001)

- Darden v. City of Fort Worth, 880 F.3d 722, 727 (5th Cir. 2018)
- Deville v. Marcantel, 567 F.3d 156, 164, 170, 172-73 (5th Cir. 2009)
- Wells v. Bonner, 45 F.3d 90, 95 (5th Cir. 1995)
- Kyle v. City of New Orleans, 353 So. 2d 969, 971-73 (La. 1977)
- McLin v. Ard, 866 F.3d 682, 689 (5th Cir. 2017)
- Taylor v. Gregg, 36 F.3d 453, 456-57 (5th Cir. 1994)
- Castellano v. Fragozo, 352 F.3d 939, 949 (5th Cir. 2003) (en banc)
- Hand v. Gary, 838 F.2d 1420, 1427-28 (5th Cir. 1988)
- Buehler v. City of Austin/Austin Police Department, 824 F.3d 548, 555-56 (5th Cir. 2016)
- Cuadra v. Houston Independent School District, 626 F.3d 808, 813-14 (5th Cir. 2010)
- Craig v. Dallas Area Rapid Transit Authority, 504 F. App'x 328, 332-33 (5th Cir. 2012)
- Shields v. Twiss, 389 F.3d 142, 150 (5th Cir. 2004)
- Hughes v. Garcia, 100 F.4th 611, 619 (5th Cir. 2024)
- Thompson v. Clark, 596 U.S. 36, 43 (2022)
- Wooten v. Harrell, No. CV 23-368-SDD-SDJ, 2024 WL 1815349, at *6-*8 (M.D. La. Apr. 25, 2024)
- Armstrong v. Ashley, 60 F.4th 262, 279 (5th Cir. 2023)
- Darden v. City of Fort Worth, 880 F.3d 722, 728 (5th Cir. 2018)
- Cooper v. Brown, 844 F.3d 517, 522 (5th Cir. 2016)
- Deville v. Marcantel, 567 F.3d 156, 167 (5th Cir. 2009)
- Graham v. Connor, 490 U.S. 386, 396 (1989)
- Goffney v. Saucedo, 340 F. App'x 181, 184 (5th Cir. 2009)
- Ikerd v. Blair, 101 F.3d 430, 434 (5th Cir. 1996)
- Thomas v. Gulotta, 2017 WL 379449, at *7 (M.D. La. Jan. 26, 2017)
- Freeman v. Gore, 483 F.3d 404, 417 (5th Cir. 2007)
- Penn v. St. Tammany Parish Sheriff's Office, 2002-0893 (La. App. 1 Cir. 4/2/03), 843 So. 2d 1157, 1161
- Shepherd on behalf of Estate of Shepherd v. City of Shreveport, 920 F.3d 278, 286 (5th Cir. 2019)
- Imani v. City of Baton Rouge, 614 F. Supp. 3d 306, 380-82 (M.D. La. 2022)
- Pearson v. Callahan, 555 U.S. 223, 231, 236 (2009)
- Ezell v. Seal, No. CV 23-1514-SDD-EWD, 2025 WL 3124046, at *4 (M.D. La. Nov. 7, 2025)
- Gobert v. Caldwell, 463 F.3d 339, 345 (5th Cir. 2006)
- Hope v. Pelzer, 536 U.S. 730 (2002)
- Rodgers v. Edwards, No. CV 21-233-JWD-SDJ, 2023 WL 9007801, at *2 (M.D. La. Dec. 18, 2023)
- Michalik v. Hermann, 422 F.3d 252, 262 (5th Cir. 2005)
- Bellard v. Gautreaux, 675 F.3d 454, 464 (5th Cir. 2012)
- Costello v. Hardy, 864 So. 2d 129, 139 (La. 2004)
- Robertson v. City of Shreveport, No. CV 17-CV-0565, 2018 WL 1769373, at *3 (W.D. La. Apr. 12, 2018)
- Trentecosta v. Beck, 96-2388 (La. 10/21/97), 703 So. 2d 552, 562-64

- Roche v. Aetna Casualty & Surety Co., 303 So. 2d 888 (La. Ct. App. 1974), writ denied, 307 So. 2d 372 (La. 1975)
- Mitchell v. D.O.C., No. CIV.A. 12-0092-BAJ, 2013 WL 311440, at *6 (M.D. La. Jan. 25, 2013)

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