

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Joshua Chronicles v. Loyola University New Orleans

Chronicles · No. 25-2211 · Decided November 25, 2025

SUMMARY

The United States District Court for the Eastern District of Louisiana denied Joshua Chronicles's amended motion to appoint counsel in his civil-rights action against Loyola University New Orleans and denied the original motion as moot. The court found that, although Chronicles was indigent and had attempted to obtain counsel, exceptional circumstances did not warrant appointment at that stage because he was a third-year law student who had adequately presented his claims pro se.

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	November 25, 2025
DOCKET	25-2211
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, proceeding pro se and in forma pauperis, moved for appointment of counsel in a civil-rights action. The court considered an amended motion and denied it, while denying the original motion as moot.
STANDARD OF REVIEW	Appointment of counsel in a civil case is discretionary and is appropriate only when the plaintiff demonstrates exceptional circumstances or when appointment would advance the proper administration of justice. The plaintiff bears the burden of persuasion and must address indigence, efforts to secure counsel, case complexity, ability to present and investigate the case, and the anticipated need for skill in presenting conflicting evidence.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- section 1983
- civil rights
- first amendment
- procedural due process

PRACTICE AREAS

civil procedure

civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether the plaintiff established grounds for appointment of counsel under 28 U.S.C. § 1915(e)(1) in a civil-rights action.
2. Whether the original motion to appoint counsel remained operative after the filing of the amended motion.

HOLDINGS

1. The plaintiff did not establish exceptional circumstances or a sufficient need for appointed counsel at that stage of the case, so the amended motion to appoint counsel was denied without prejudice to renewal if circumstances later changed.
2. The original motion to appoint counsel was superseded by the amended motion and was denied as moot.

KEY QUOTATIONS

“the “court may request an attorney to represent any person unable to afford counsel.”” (§ II)

FACTUAL BACKGROUND

Joshua Chronicles, a third-year Loyola University New Orleans law student, alleged that Loyola personnel retaliated against him and discriminated against him based on race and religion, interfered with protected expression and misconduct reports, and violated procedural due process during disciplinary proceedings. He alleged that personnel accessed and altered unsent email drafts and that a disciplinary hearing resulted in a one-year suspension. He sought appointed counsel based on the asserted complexity of his claims and his medical and psychological limitations.

PROCEDURAL HISTORY

Joshua Chronicles filed an action against Loyola University New Orleans asserting claims under 42 U.S.C. § 1983, Title VI, Title IX, and the First Amendment. After the court granted him in forma pauperis status, he filed an original and then an amended motion seeking appointment of counsel from the Eastern District of Louisiana Civil Pro Bono Panel. The court denied the amended motion at that time and denied the original motion as moot.

DISPOSITION

other

CASES CITED

- Caston v. Sears, Roebuck & Co., 556 F.2d 1305, 1309-10 (5th Cir. 1977)
- Norton v. E.U. Dimazana, 122 F.3d 286, 293 (5th Cir. 1997)
- Akasike v. Fitzpatrick, 26 F.3d 510, 512 (5th Cir. 1994)

- Vitug v. Merit Sys. Protection Bd., Civ. A. No. 01-3297, 2002 WL 1216023 (E.D. La. June 4, 2002)
- Salmon v. Corpus Christi Indep. Sch. Dist., 911 F.2d 1165, 1166 (5th Cir. 1990)
- Ulmer v. Chancellor, 691 F.2d 209, 212-13 (5th Cir. 1982)
- Parker v. Carpenter, 978 F.2d 190, 193 (5th Cir. 1992)

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