

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Matthew A. Smith v. Rent-A-Center

Smith v. Rent-A-Center · No. 24-cv-03120-RMR-NRN · Decided March 16, 2026

SUMMARY

The United States District Court for the District of Colorado denied Matthew A. Smith’s motion to stay execution or proceedings until he could retain an attorney. The court concluded that the case had already been dismissed without prejudice for failure to prosecute, final judgment had been entered, and no pending action or appeal appeared to exist. The court also determined that a stay would not promote efficiency or simplify the matter and would prejudice the defendant.

CASE DETAILS

COURT	United States District Court for the District of Colorado
WRITING FOR THE COURT	Regina M. Rodriguez
JURISDICTION	United States District Court for the District of Colorado
DECIDED	March 16, 2026
DOCKET	24-cv-03120-RMR-NRN
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to stay execution after the court entered final judgment dismissing his claims without prejudice for failure to prosecute. The district court denied the motion.
STANDARD OF REVIEW	Abuse-of-discretion framework governing a district court's discretionary decision to stay proceedings or enforcement; the court exercised its broad discretion to control its docket.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Matthew A. Smith v. Rent-A-Center

TOPICS

- civil procedure
- sanctions
- ada / disability
- reasonable accommodation

PRACTICE AREAS

- civil procedure
- sanctions
- disability discrimination
- civil rights

QUESTIONS PRESENTED

1. Whether the court should stay execution or proceedings after final judgment had been entered and the case had been closed.
2. Whether Plaintiff's request for a stay until he could retain counsel was justified under the discretionary stay factors concerning efficiency, prejudice, hardship, and inequity.

HOLDINGS

1. A stay was not warranted because the case had been resolved and closed, with no pending action or appeal to stay, and Plaintiff had not shown that a stay would simplify the matter, promote efficiency, or otherwise provide a justified benefit.
2. Plaintiff's pro se status did not justify granting a stay; although pro se filings are construed liberally, a pro se litigant must comply with the same procedural rules as other litigants.

KEY QUOTATIONS

"A court has broad discretion to stay proceedings as an incident to its power to control its own docket."
(Legal Standard section)

"It is unclear exactly what Plaintiff seeks to stay because there are no pending actions in, or appeals of, this matter." (Analysis section)

"A stay in this matter is not justified or beneficial." (Analysis section)

FACTUAL BACKGROUND

Plaintiff's claims had already been dismissed without prejudice for failure to prosecute, and final judgment had been entered. Plaintiff was subject to filing restrictions and prior sanctions based on repeated filings intended to avoid those restrictions. He moved to stay execution until an attorney could be retained, but no attorney had entered an appearance and there were no pending proceedings or appeals in the case.

PROCEDURAL HISTORY

The case was dismissed without prejudice for failure to prosecute after a magistrate judge recommended dismissal and the district judge adopted the recommendation. Final judgment was entered on August 4, 2025, and the case was closed. Plaintiff later moved to stay execution until he could retain an attorney; the court denied the motion because no action or appeal remained pending and a stay was not justified under the relevant discretionary factors.

DISPOSITION

other

CASES CITED

- Trackwell v. United States, 472 F.3d 1242, 1243 (10th Cir. 2007)

- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Green v. Dorrell, 969 F.2d 915, 917 (10th Cir. 1992)
- Nielsen v. Price, 17 F.3d 1276, 1277 (10th Cir. 1994)
- Garrett v. Selby Connor Maddux & Janer, 425 F.3d 836, 840 (10th Cir. 2005)
- Clinton v. Jones, 520 U.S. 681, 706-07 (1997)
- Landis v. North American Co., 299 U.S. 248, 254 (1936)
- Charles Schwab & Co., Inc. v. Highwater Wealth Mgmt., LLC, No. 17-cv-00803-CMA-NYW, 2017 WL 3503353, at *2 (D. Colo. Aug. 16, 2017)
- Core Progression Franchise LLC v. O'Hare, 2021 WL 6340162, at *2 (D. Colo. Dec. 29, 2021)
- Tigercat Int'l, Inc. v. Caterpillar Inc., 2018 WL 2049816, at *2 n.3 (D. Del. May 2, 2018)
- Smith v. Byron White 10th Circuit Federal Court, Case No. 14-cv-00669-LTB, ECF No. 7 (D. Colo. Apr. 4, 2014)
- Smith v. Aetna, No. 22-cv-00426-RM-RSBP, 2024 WL 760133, at *1 (D. Colo. Jan. 18, 2024)
- Smith v. Waffle House, No. 19-cv-01613-GPG, ECF No. 12 (D. Colo. July 16, 2019)
- Smith v. United Parcel Serv., Inc., No. 16-cv-00224-GPG, ECF No. 7 (D. Colo. Feb. 17, 2016)
- Smith v. United Parcel Serv., No. 24-cv-443-SBP, ECF No. 36 (D. Colo. Jan. 28, 2025)
- Smith v. Enter. Leasing Co. of Denver, LLC, No. 25-cv-02539-LTB-RTG, ECF Nos. 1-2, 10-11, 15-16 (D. Colo. 2025)

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