

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE

Darren Little v. Sandra Metcalf

No. 3:24-cv-00758 · No. No. 3:24-cv-00758 · Decided April 2, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee grants Darren Little’s application to proceed in forma pauperis and assesses the statutory filing fee under the Prison Litigation Reform Act. The court dismisses the action without prejudice for lack of subject-matter jurisdiction because the complaint asserts only state-law slander and defamation claims and does not establish federal-question or diversity jurisdiction.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee
WRITING FOR THE COURT	William L. Campbell, Jr.
JURISDICTION	United States District Court for the Middle District of Tennessee
DECIDED	April 2, 2026
DOCKET	No. 3:24-cv-00758
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner filed a civil action alleging slander. The court granted leave to proceed in forma pauperis and sua sponte dismissed the action without prejudice for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	The court independently examined subject-matter jurisdiction sua sponte. A federal court must dismiss an action at any time if it determines that subject-matter jurisdiction is lacking.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order from a federal district court.
PARTIES	Darren Little v. Sandra Metcalf

TOPICS

- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court had federal-question jurisdiction over Plaintiff's state-law slander and defamation claims.
2. Whether Plaintiff established diversity jurisdiction under 28 U.S.C. § 1332.
3. Whether the action should be dismissed without prejudice for lack of subject-matter jurisdiction.
4. Whether Plaintiff should be permitted to proceed in forma pauperis and pay the filing fee through prisoner-account deductions under the PLRA.

HOLDINGS

1. The court lacked federal-question jurisdiction because slander and defamation are state-law torts and Plaintiff did not assert a federal cause of action.
2. Plaintiff did not establish a basis for diversity jurisdiction, and the face of the complaint showed no apparent basis for federal jurisdiction.
3. A federal court must dismiss an action when it determines that subject-matter jurisdiction is lacking, including when the issue is raised sua sponte.
4. The IFP application was granted, but Plaintiff remained responsible for the full civil filing fee, payable through the PLRA's initial partial payment and installment procedures.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction. Unlike state trial courts, they do not have general jurisdiction to review questions of federal and state law, but only the authority to decide cases that the Constitution and Congress have empowered them to resolve.”

“[F]ederal courts have a duty to consider their subject matter jurisdiction in regard to every case and may raise the issue sua sponte.”

“If the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action.”

“Because Plaintiff has not asserted any basis for federal jurisdiction, and it is apparent from the face of the complaint that no basis for federal jurisdiction exists, this action is DISMISSED without prejudice.”

FACTUAL BACKGROUND

Darren Little, who was incarcerated at Whiteville Correctional Facility in Tennessee, filed a pro se complaint against Sandra Metcalf alleging slander and defamation. He did not identify a federal cause of action, his own state of citizenship, or Defendant's state of citizenship. He identified Defendant as an employee of the Lincoln County Sheriff's Department in Fayetteville, Tennessee and listed his own address as Whitesville, Tennessee.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint and an application to proceed in forma pauperis. The court granted the IFP application, assessed the full civil filing fee under the Prison Litigation Reform Act, and dismissed the complaint without prejudice after determining that Plaintiff had not established federal-question or diversity jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Ohio ex rel. Skaggs v. Brunner, 549 F.3d 468, 474 (6th Cir. 2008)
- Answers in Genesis, Inc. v. Creation Ministries Int'l, Ltd., 556 F.3d 459, 465 (6th Cir. 2009)
- Goff v. Moore, No. 20-1243-JDT-cgc, 2020 WL 6292752, at *2 (W.D. Tenn. Oct. 27, 2020)
- Bartel v. F.A.A., 725 F.2d 1403, 1404 n.2 (D.C. Cir. 1984)