

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

James G. Watson v. Brittany Knap, et al.

Watson · No. 3:25-CV-217-CEA-DCP · Decided March 10, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee denies James G. Watson’s renewed motion for appointment of counsel in his civil-rights action. The court concludes that Watson did not demonstrate financial eligibility or exceptional circumstances warranting appointed counsel, while noting that he may separately seek electronic-filing registration, deadline extensions, or remote appearances as appropriate.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Debra C. Poplin
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	March 10, 2026
DOCKET	3:25-CV-217-CEA-DCP
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for appointment of counsel in an ongoing federal civil-rights action and renewed the motion after an earlier request. The court considered the motion under 28 U.S.C. § 1915(e)(1).
STANDARD OF REVIEW	Discretionary review of a civil litigant's request for appointed counsel under the exceptional-circumstances standard.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive only
PARTIES	James G. Watson v. Brittany Knap, et al.

TOPICS

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

PRACTICE AREAS

- civil procedure
- civil rights
- disability law

QUESTIONS PRESENTED

1. Whether exceptional circumstances warranted appointment of counsel for the plaintiff in this civil action.
2. Whether the plaintiff's asserted disabilities, the alleged complexity of his civil-rights claims, and his requests for accommodations justified appointment of counsel.
3. Whether the Americans with Disabilities Act or Section 504 of the Rehabilitation Act required appointment of counsel or otherwise applied to the federal court.

HOLDINGS

1. Appointment of counsel was not warranted because the plaintiff failed to show exceptional circumstances, including in light of his demonstrated ability to initiate the action and file motions without counsel and the absence of extraordinary factual or legal complexity.
2. The court rejected plaintiff's reliance on the ADA and Section 504 of the Rehabilitation Act because those statutes do not apply to federal courts.
3. The court did not grant the requested accommodations through the appointment-of-counsel motion; it stated that plaintiff could separately move to register as an E-Filer and could request extensions or remote appearances when appropriate.

KEY QUOTATIONS

“The appointment of counsel in civil cases is not a constitutional right, but the Court may use its discretion to appoint counsel in civil cases if “exceptional circumstances” exist.” (Doc. 22)

“The Court therefore DENIES Plaintiff's motion [Doc. 22].” (Doc. 22)

FACTUAL BACKGROUND

Plaintiff asserted that disabilities limited his ability to respond to legal mail, prepare filings, travel, and appear in person without assistance. He had nevertheless initiated the action and filed motions without counsel. The court also found that his monthly income exceeded his expenses and that he had paid the filing fee.

PROCEDURAL HISTORY

Watson filed a federal civil-rights action and proceeded without counsel. He renewed his request for appointed counsel, asserting financial and disability-related difficulties and the complexity of his claims. The court found that he had paid the filing fee, that his income exceeded his expenses, and that he had not demonstrated exceptional circumstances; it denied the motion.

DISPOSITION

other

CASES CITED

- Brubaker v. Barrett, 801 F. Supp. 2d 743, 763 (E.D. Tenn. 2011)
- Lavado v. Keohane, 992 F.2d 601, 606 (6th Cir. 1993)
- Anderson v. Dugger, No. 2:24-CV-187, 2025 WL 2087801, at *1 (E.D. Tenn. Jan. 21, 2025)
- Rockenhaus v. Agapiou, No. 2:25-CV-12716, 2026 WL 120834, at *1 (E.D. Mich. Jan. 16, 2026)
- Brown v. Smith, No. 24-11662, 2025 WL 20413, at *3 n.2 (E.D. Mich. Jan. 2, 2025)

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