

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Justin Holman, Sr. v. Ron Neal, et al.

Holman v. Neal · No. 3:25-CV-358-HAB-ALT · Decided March 26, 2026

SUMMARY

The court struck a pro se prisoner’s complaint because it presented unrelated claims against multiple defendants, including allegations concerning PREA violations, retaliation, confinement conditions, cell painting, and administrative segregation. The court granted Justin Holman, Sr. until April 30, 2026, to file an amended complaint containing related claims.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Holly A. Brady
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	March 26, 2026
DOCKET	3:25-CV-358-HAB-ALT
DISPOSITION	other
PROCEDURAL POSTURE	A pro se prisoner filed a complaint asserting multiple unrelated claims against nine defendants. The district court struck the complaint for misjoinder and granted the plaintiff leave to file an amended complaint containing related claims.
PRECEDENTIAL VALUE	unknown
PARTIES	Justin Holman, Sr. v. Ron Neal, et al.

TOPICS

- joinder
- pleadings
- civil procedure
- prisoners rights

PRACTICE AREAS

- civil procedure
- prisoner civil rights

QUESTIONS PRESENTED

1. Whether a prisoner complaint asserting unrelated claims against multiple defendants may proceed as a single action.
2. What procedural remedy is appropriate when a complaint contains unrelated or misjoined claims.

HOLDINGS

1. Unrelated claims against different defendants do not belong in the same action; a prisoner must pursue properly joined and related claims in the current case and bring separate groups of unrelated claims in separate lawsuits.
2. When a complaint contains unrelated or misjoined claims, the court may strike the complaint and allow the plaintiff to select related claims to pursue in the action, while requiring separate lawsuits for other unrelated groups of claims.

KEY QUOTATIONS

“A litigant cannot throw all of his grievances, against dozens of different parties, into one stewpot.” (Opinion and Order)

“[U]nrelated claims against different defendants belong in different suits,” (Opinion and Order)

FACTUAL BACKGROUND

Justin Holman, Sr., a prisoner proceeding without counsel, filed a complaint naming nine defendants. The complaint alleged events involving PREA violations and retaliatory conduct reports in one cell house, conditions of confinement in another cell house, painting of his cell, and detention in administrative segregation. The court found no clear relationship among these claims other than that they occurred at the Indiana State Prison.

PROCEDURAL HISTORY

Holman filed a complaint alleging PREA violations, retaliation, unconstitutional conditions of confinement, improper cell-painting requirements, and improper placement in administrative segregation. The court concluded that the claims were unrelated and misjoined, struck the complaint while retaining it as part of the public record, and gave Holman until April 30, 2026, to file an amended complaint limited to related claims.

DISPOSITION

other

CASES CITED

- *Wheeler v. Wexford Health Sources, Inc.*, 689 F.3d 680, 683 (7th Cir. 2012)
- *George v. Smith*, 507 F.3d 605, 607 (7th Cir. 2007)

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