

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, NORTHEASTERN DIVISION

Lakeisha Shante Williams v. Jarvis Garys, et al.

Williams v. Garys · No. 5:25-cv-01969-CLS · Decided November 24, 2025

SUMMARY

The court grants the plaintiff's application to proceed in forma pauperis but reviews the complaint under 28 U.S.C. § 1915(e)(2). It concludes that the allegations concerning events from 2006 and 2007 do not establish federal-question, federal-defendant, or diversity jurisdiction and appear likely time-barred. The action is dismissed for lack of subject-matter jurisdiction.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Northeastern Division
JURISDICTION	United States District Court for the Northern District of Alabama, Northeastern Division
DECIDED	November 24, 2025
DOCKET	5:25-cv-01969-CLS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff applied to proceed in forma pauperis in a newly filed civil action. The district court granted the application but independently reviewed the complaint under 28 U.S.C. § 1915(e)(2) and dismissed the action for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), a complaint filed by a plaintiff proceeding in forma pauperis must be dismissed if it is frivolous or malicious or fails to state a claim upon which relief may be granted; the court also reviewed whether the complaint established subject-matter jurisdiction.
PRECEDENTIAL VALUE	unpublished
PARTIES	Lakeisha Shante Williams v. Jarvis Garys, et al.

TOPICS

- subject matter jurisdiction
- pleadings
- civil procedure
- statute of limitations

PRACTICE AREAS

civil procedure

civil rights

federal jurisdiction

QUESTIONS PRESENTED

1. Whether Williams established subject-matter jurisdiction under the federal-question, United States-party, or diversity-jurisdiction statutes.
2. Whether the court could dismiss the complaint after granting Williams leave to proceed in forma pauperis.
3. Whether the allegations appeared to be barred by the applicable statute of limitations.

HOLDINGS

1. The application to proceed in forma pauperis was due to be granted because Williams submitted an affidavit substantiating her inability to pay the required filing fee.
2. The complaint did not establish jurisdiction under 28 U.S.C. § 1331 because it did not assert a claim arising under the Constitution, laws, or treaties of the United States, and no federal claim was apparent from the allegations.
3. The complaint did not establish jurisdiction under 28 U.S.C. § 1346 because it did not show that Officer Matthews or any other defendant was an employee or officer of the United States government.
4. The complaint did not establish diversity jurisdiction under 28 U.S.C. § 1332 because Williams did not allege an amount in controversy exceeding \$75,000 or citizenship diverse from that of the defendants.
5. Granting leave to proceed in forma pauperis did not prevent dismissal because the court was required to review the complaint and dismiss an action that was frivolous or malicious or failed to state a claim, and this action lacked a basis for subject-matter jurisdiction.

KEY QUOTATIONS

“Even so, a case in which the court permits a plaintiff to proceed without prepayment of fees still must be dismissed if the court determines that the action is “frivolous or malicious,” or that the complaint fails to state a claim upon which relief may be granted.” (at 1)

“Because there is no basis for this court’s subject-matter jurisdiction, the action will be dismissed.” (at 3)

FACTUAL BACKGROUND

Williams alleged that events in 2006 and January 2007 involved police following her through traffic lanes, a collision near Oakwood, detention in the Madison County jail, and her eventual release on bond. Her handwritten complaint did not clearly identify a federal claim, federal statute, constitutional provision, or federal defendant. She also did not explain how the amount in controversy exceeded \$75,000, and the face of the complaint appeared to identify Alabama citizens on both sides.

PROCEDURAL HISTORY

Williams filed a handwritten pro se complaint and an application to proceed in forma pauperis. The court found that her affidavit established inability to pay and granted in forma pauperis status, but concluded that the complaint did not establish federal-question, United States-party, or diversity jurisdiction and dismissed the action. A separate order was to be entered contemporaneously.

DISPOSITION

dismissed

CASES CITED

- Tannenbaum v. United States, 148 F.3d 1262, 1263 (11th Cir. 1998)
- GJR Investments, Inc. v. County of Escambia, Florida, 132 F.3d 1359, 1369 (11th Cir. 1998)

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