

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Matthew Eric Gregory Langdon v. Sumner County Sheriff's Office,
Judge Richardson et al.

Langdon · No. 3:26-cv-00550 · Decided May 21, 2026

SUMMARY

The court construed the plaintiff's cover letter as notice of a change of address and directed the Clerk to update his address. Because the plaintiff had been released from custody, the court required him to submit a new application to proceed without prepaying fees or pay the filing fee within 30 days, and denied his prior in forma pauperis application as moot.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Eli J. Richardson
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	May 21, 2026
DOCKET	3:26-cv-00550
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff initiated a civil action while incarcerated and sought to proceed in forma pauperis. After learning that Plaintiff had been released from custody, the court ordered him to submit a new in forma pauperis application based on his current financial status or pay the full filing fee.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

prisoners rights

civil rights

civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

QUESTIONS PRESENTED

1. Whether a plaintiff who filed an in forma pauperis application while incarcerated must submit a new application based on current financial circumstances after release from custody.
2. Whether the court should update Plaintiff's address and provide an opportunity to continue the action by submitting a new in forma pauperis application or paying the full filing fee.

HOLDINGS

1. Because Plaintiff had been released from custody, he was required to submit a new in forma pauperis application based on his current financial status if he wished to proceed as a pauper, or instead pay the full civil filing fee.
2. Plaintiff's original in forma pauperis application was denied as moot after his release from custody.

KEY QUOTATIONS

“Because Plaintiff has been released from custody, if he wishes to proceed as a pauper, he must submit a new IFP Application based on his current financial status.”

FACTUAL BACKGROUND

Plaintiff filed the action while in custody of the Sumner County Jail in Gallatin, Tennessee. His Tennessee Department of Correction information showed that he had been released and was under active supervision rather than incarcerated. In a cover letter, Plaintiff provided a forwarding address, which the court treated as a notice of address change.

PROCEDURAL HISTORY

Matthew Langdon filed this civil action while in custody at the Sumner County Jail and submitted an original in forma pauperis application. The court determined that he was no longer incarcerated, construed his cover letter as notice of a change of address, denied the original in forma pauperis application as moot, and directed him to submit a new application or pay the filing fee within 30 days. The court stated that the action would be dismissed if he took no further action.

DISPOSITION

other

CASES CITED

- In re Prison Reform Litigation Act, 105 F.3d 1131, 1139 (6th Cir. 1997)