

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

Samuel Lee Patterson v. M.G. Wolfe, et al.

Patterson v. Wolfe · No. 1:23-cv-00614 · Decided December 4, 2025

SUMMARY

The document is an Order, Memorandum Opinion, and Recommendation addressing motions in Samuel Lee Patterson’s 42 U.S.C. § 1983 action arising from a March 2021 arrest in North Carolina. The magistrate judge denies the motion to seal, recommends denying Patterson’s motion to amend, and recommends granting the defendants’ motions for summary judgment. The opinion discusses Heck v. Humphrey, excessive force, bystander liability, deliberate indifference to medical needs, qualified immunity, and official-capacity claims.

CASE DETAILS

COURT	United States District Court for the Middle District of North Carolina
WRITING FOR THE COURT	Joe L. Webster
JURISDICTION	United States District Court for the Middle District of North Carolina
DECIDED	December 4, 2025
DOCKET	1:23-cv-00614
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought an action under 42 U.S.C. § 1983 arising from a March 2021 arrest. The magistrate judge considered defendants' motions for summary judgment, plaintiff's motion to amend, a discovery motion, and a motion to seal medical records, and issued an order and memorandum opinion and recommendation.
STANDARD OF REVIEW	Summary judgment is appropriate when no genuine dispute of material fact exists and the movant is entitled to judgment as a matter of law. The evidence and reasonable inferences are viewed in the light most favorable to the nonmoving party, but the nonmoving party must present evidence beyond the pleadings sufficient for a reasonable factfinder to return a verdict in its favor. A video recording that blatantly contradicts a party's account may control the facts for summary-judgment purposes.

PRECEDENTIAL VALUE	unpublished and nonprecedential magistrate-judge report and recommendation
PARTIES	Samuel Lee Patterson v. B. Laws, M.G. Wolfe

TOPICS

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QUESTIONS PRESENTED

1. Whether plaintiff should be permitted to file a second amended complaint after discovery closed and summary-judgment motions were briefed.
2. Whether plaintiff's claims challenging the lawfulness of the vehicle pursuit and arrest were barred by *Heck v. Humphrey* because his convictions remained valid.
3. Whether the evidence created a genuine dispute that Defendant Wolfe used excessive force during plaintiff's restraint and arrest.
4. Whether defendants were liable under a bystander-liability theory for failing to intervene in an alleged use of excessive force.
5. Whether Defendant Wolfe was deliberately indifferent to plaintiff's serious medical needs by allegedly providing misleading information to emergency personnel.
6. Whether Defendant Wolfe was entitled to qualified immunity.
7. Whether plaintiff's official-capacity claim against Defendant Wolfe could proceed without an underlying constitutional violation.
8. Whether Defendant Laws used excessive force after plaintiff was handcuffed and restrained.
9. Whether Defendant Wolfe's medical records should be sealed under the First Amendment right of access to judicial records.

HOLDINGS

1. Leave to amend was properly denied because the proposed amendment, filed more than two years after the action began and after discovery and summary-judgment briefing, would cause undue delay and prejudice.
2. To the extent plaintiff sought to undermine his convictions by challenging the lawfulness of the vehicle pursuit or arrest, those claims were barred by *Heck v. Humphrey* because the convictions had not been reversed, expunged, declared invalid, or called into question by habeas relief.
3. Summary judgment was warranted on the excessive-force claims because the record and video evidence showed no genuine dispute that the force used to restrain plaintiff during the arrest was objectively

unreasonable, and the video contradicted plaintiff's allegation that force continued after he was handcuffed.

4. Defendants were entitled to summary judgment on plaintiff's failure-to-intervene claims because plaintiff failed to establish an underlying constitutional violation and the record did not show that either defendant had a reasonable opportunity to prevent the alleged strike.
5. Plaintiff failed to establish deliberate indifference because he received prompt and adequate medical care, and the alleged misleading statement by Wolfe did not delay or deny treatment.
6. Wolfe was entitled to qualified immunity because plaintiff failed to demonstrate a constitutional violation.
7. Plaintiff's official-capacity claim against Wolfe failed because there was no underlying constitutional violation supporting municipal liability.
8. The motion to seal was denied because defendant did not show a compelling governmental interest narrowly tailored to overcome the First Amendment right of access to judicial records.

KEY QUOTATIONS

“when a state prisoner seeks damages in a section 1983 suit, the district court must consider whether a judgment in favor of the plaintiff would necessarily imply the invalidity of his conviction or sentence” (at 487)

“The Fourth Amendment’s bar on unreasonable seizures prohibits the use of excessive force by a police officer in effectuating an arrest.” (at 396)

“an officer may be liable under § 1983, on a theory of bystander liability, if he: (1) knows that a fellow officer is violating an individual’s constitutional rights; (2) has a reasonable opportunity to prevent the harm; and (3) chooses not to act.” (at 203-04)

“when execution of a government’s policy or custom, whether made by its lawmakers or by those whose edicts or acts may fairly be said to represent official policy, inflicts the injury that the government as an entity is responsible.” (at 694)

FACTUAL BACKGROUND

During a March 13, 2021 incident, Defendant Wolfe observed plaintiff driving at excessive speed and initiated a vehicle pursuit after plaintiff failed to stop. The pursuit continued at high speed and involved dangerous driving before Defendant Laws used a precision immobilization maneuver; plaintiff then attempted to flee on foot and resisted officers' efforts to restrain and handcuff him. Plaintiff alleged that officers used excessive force, including after he was handcuffed, that Wolfe failed to intervene and interfered with medical care, and that defendants were liable in their official capacities. Video and other record evidence showed that plaintiff received prompt medical treatment, including staples for a scalp laceration, and did not show force after he was handcuffed.

PROCEDURAL HISTORY

The original complaint against Defendant Laws was dismissed, but a prior judgment was partially vacated and an amended complaint was allowed to proceed against Laws on a limited individual-capacity excessive-force

claim and against Wolfe. After discovery closed and defendants moved for summary judgment, plaintiff sought leave to file a second amended complaint. The court denied the motion to seal and denied the remaining discovery request as moot, recommended granting summary judgment to Laws and Wolfe, recommended denying leave to amend, and recommended dismissal with prejudice.

DISPOSITION

other

CASES CITED

- *Nourison Rug Corp. v. Parvizian*, 535 F.3d 295, 298 (4th Cir. 2008)
- *Belcher v. W.C. English Inc.*, 125 F. Supp. 3d 544, 548 (M.D.N.C. 2015)
- *DeWitt v. Hutchins*, 309 F. Supp. 2d 743, 748 (M.D.N.C. 2004)
- *Whitaker v. Protective Life Insurance Co.*, No. CV 6:10-2314-TMC, 2014 WL 12736154, at *1 (D.S.C. Nov. 12, 2014)
- *Kostenko v. Ranavaya*, No. CIV.A. 5:07-CV-00462, 2008 WL 691684, at *2 (S.D.W. Va. Mar. 12, 2008)
- *Franks v. Ross*, 313 F.3d 184, 193 (4th Cir. 2002)
- *Foman v. Davis*, 371 U.S. 178, 182 (1962)
- *Sciacca v. Durham County Board of Education*, 509 F. Supp. 3d 505, 515 (M.D.N.C. 2020)
- *Laber v. Harvey*, 438 F.3d 404, 427 (4th Cir. 2006)
- *Norris v. United States*, No. 5:10-CT-3026-FL, 2013 WL 756293, at *3 (E.D.N.C. Feb. 28, 2013)
- *McPherson v. McCabe*, No. 5:04-CT-990-FL, 2007 WL 4246582, at *3 (E.D.N.C. Apr. 10, 2007), *aff'd*, 241 F. App'x 963 (4th Cir. 2007)
- *Norris v. PNC Bank, N.A.*, No. CV ELH-20-3315, 2022 WL 180753, at *6 (D. Md. Jan. 19, 2022)
- *Zahodnick v. International Business Machines Corp.*, 135 F.3d 911, 913 (4th Cir. 1997)
- *Temkin v. Frederick County Commissioners*, 945 F.2d 716, 718 (4th Cir. 1991)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 323, 331 (1986)
- *Matsushita Electric Industrial Co. v. Zenith Radio Corp.*, 475 U.S. 574, 587 (1986)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248-50 (1986)
- *Sylvia Development Corp. v. Calvert County, Md.*, 48 F.3d 810, 817 (4th Cir. 1995)
- *Evans v. Technologies Applications & Service Co.*, 80 F.3d 954, 962 (4th Cir. 1996)
- *Heck v. Humphrey*, 512 U.S. 477, 487 (1994)
- *Covey v. Assessor of Ohio County*, 777 F.3d 186, 197 (4th Cir. 2015)
- *Conley v. Grigsby*, No. 7:22-CV-00027, 2023 WL 1868228, at *2 n.3 (W.D. Va. Feb. 9, 2023)
- *Scott v. Harris*, 550 U.S. 372, 375, 378, 380, 386 (2007)
- *Schultz v. Braga*, 455 F.3d 470, 476 (4th Cir. 2006)
- *Livingston v. Kehagias*, 803 F. App'x 673, 683 (4th Cir. 2020)
- *Herman Harris v. Zachary Pittman*, *Harris v. Pittman*, 927 F.3d 266, 272 (4th Cir. 2019)

- *Young v. Prince George's County, Maryland*, 355 F.3d 751, 758 (4th Cir. 2004)
- *Graham v. Connor*, 490 U.S. 386, 396 (1989)
- *Brosseau v. Haugen*, 543 U.S. 194, 197 (2004)
- *E.W. by and through T.W. v. Dolgos*, 884 F.3d 172, 179 (4th Cir. 2018)
- *Streater v. Wilson*, 565 F. App'x 208, 211 (4th Cir. 2014)
- *Elliott v. Leavitt*, 99 F.3d 640, 642 (4th Cir. 1996)
- *Kingsley v. Hendrickson*, 576 U.S. 389, 397 (2015)
- *Clem v. Corbeau*, 284 F.3d 543, 550 (4th Cir. 2002)
- *Smith v. Ray*, 781 F.3d 95, 101 (4th Cir. 2015)
- *Orem v. Rephann*, 523 F.3d 442, 446 (4th Cir. 2008)
- *Lombardo v. City of St. Louis, Missouri*, 594 U.S. 464, 467 n.2 (2021)
- *Somers v. Devine*, 732 F. Supp. 3d 445, 474 (D. Md. 2024), *aff'd*, 132 F.4th 689 (4th Cir. 2025)
- *Dalton v. Liles*, No. 5:19-CV-00083-MR, 2021 WL 3493150, at *7 (W.D.N.C. Aug. 9, 2021)
- *Mulder v. Norton*, No. 5:13-CV-574-F, 2016 WL 3566655, at *8-9 (E.D.N.C. June 24, 2016)
- *Graham v. Cox*, No. CV ELH-18-221, 2019 WL 1427860, at *13 (D. Md. Mar. 29, 2019)
- *Bostic v. Rodriguez*, 667 F. Supp. 2d 591, 605 (E.D.N.C. 2009)
- *Newsaun v. Shirley*, No. 5:21-CT-3124-FL, 2024 WL 1200282, at *2 (E.D.N.C. Mar. 20, 2024)
- *Dodson v. Prince George's County*, No. JKS 13-2916, 2016 WL 67255, at *3 (D. Md. Jan. 6, 2016)
- *Martin v. Seabolt*, No. 1:21CV906, 2023 WL 3074718, at *6 (M.D.N.C. Apr. 25, 2023)
- *City of Revere v. Massachusetts General Hospital*, 463 U.S. 239, 244 (1983)
- *Martin v. Gentile*, 849 F.2d 863, 871 (4th Cir. 1988)
- *Short v. Hartman*, 87 F.4th 593, 611 (4th Cir. 2023)
- *Harlow v. Fitzgerald*, 457 U.S. 800, 818 (1982)
- *Ridpath v. Board of Governors Marshall University*, 447 F.3d 292, 306 (4th Cir. 2006)
- *Rock for Life-UMBC v. Hrabowski*, 411 F. App'x 541, 547 (4th Cir. 2010)
- *Monell v. Department of Social Services of the City of New York*, 436 U.S. 658, 694 (1978)
- *Grayson v. Peed*, 195 F.3d 692, 697 (4th Cir. 1999)
- *Johnson v. Baltimore Police Department*, 500 F. Supp. 3d 454, 459 (D. Md. 2020)
- *Doe v. Public Citizen*, 749 F.3d 246, 267-68 (4th Cir. 2014)
- *Rushford v. New Yorker Magazine, Inc.*, 846 F.2d 249, 253 (4th Cir. 1988)
- *Virginia Department of State Police v. Washington Post*, 386 F.3d 567, 575-76 (4th Cir. 2004)
- *Fulp v. Columbiana Hi Tech, LLC*, No. 1:16-CV-1169, 2018 WL 1027159, at *10 (M.D.N.C. Feb. 21, 2018)
- *Musgrove v. Moore*, No. 1:19-CV-164, 2022 WL 19977408, at *2 (M.D.N.C. Apr. 20, 2022)
- *Hatch v. Demayo*, No. 1:16CV925, 2020 WL 6161533, at *13 (M.D.N.C. Oct. 21, 2020)
- *Garey v. James S. Farrin, P.C.*, No. 1:16CV542, 2020 WL 5211851, at *7 (M.D.N.C. Sept. 1, 2020)

