

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Carey v. Grigsby

Carey · No. 2:25-cv-02349-MSN-atc · Decided December 2, 2025

SUMMARY

The United States District Court for the Western District of Tennessee grants Defendant Aaron J. Grigsby’s motion to stay this civil action because parallel state criminal charges arise from the same incident. The case is stayed until a January 2026 status conference, subject to agreed limited discovery or mediation, to protect Defendant’s Fifth Amendment rights and allow the parties to develop a discovery plan.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Mark S. Norris
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	December 2, 2025
DOCKET	2:25-cv-02349-MSN-atc
DISPOSITION	other
PROCEDURAL POSTURE	In a civil action, the defendant moved to stay the case because the State of Tennessee had brought criminal charges against him arising from the same incident. The court granted the motion and stayed the case pending a January 2026 status conference.
STANDARD OF REVIEW	Abuse-of-discretion framework; district courts have broad discretion to determine whether to stay a civil action while a criminal action is pending or impending.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- civil procedure
- fifth amendment
- discovery dispute
- mediation

PRACTICE AREAS

- civil procedure
- constitutional law
- parallel civil and criminal proceedings

QUESTIONS PRESENTED

1. Whether the civil action should be stayed while parallel state criminal charges arising from the same incident were pending.
2. Whether a limited stay was warranted to protect the defendant's Fifth Amendment privilege, permit access to evidence held by the State, and avoid unnecessary judicial management of discovery.

HOLDINGS

1. The district court may stay a civil action while a criminal action is pending or impending when the relevant balancing factors, particularly overlapping issues and the risk to the defendant's Fifth Amendment rights, support a stay; here, a limited stay was warranted.
2. The case should be stayed until a January 2026 status conference, at which the court would reevaluate the scope and duration of the stay; the parties could nevertheless participate in mediation or conduct agreed, limited discovery before the conference.

KEY QUOTATIONS

“district courts have ‘broad discretion in determining whether to stay a civil action while a criminal action is pending or impending.’” (PageID 126)

“Therefore, this case is hereby STAYED until a status conference to be held in January of 2026.” (PageID 127)

FACTUAL BACKGROUND

The civil suit and a pending state criminal prosecution against defendant Aaron J. Grigsby arose from the same incident, creating a broad overlap of issues. Grigsby had been indicted by the State of Tennessee, and evidence relevant to the civil case was held by the State. Proceeding with unrestricted pleading and discovery could implicate Grigsby's Fifth Amendment right against self-incrimination.

PROCEDURAL HISTORY

Defendant filed a motion to stay on November 11, 2025, and a supplement on November 25, 2025. Plaintiff responded on November 28, 2025. The parties agreed that at least a partial stay was necessary to protect defendant's Fifth Amendment privilege and had begun discussing limitations on discovery. The district court granted a limited stay until a January 2026 status conference and ordered a joint status report.

DISPOSITION

other

CASES CITED

- F.T.C. v. E.M.A. Nationwide, Inc., 767 F.3d 611, 627 (6th Cir. 2014)
- Chao v. Fleming, 498 F. Supp. 2d 1034, 1037 (W.D. Mich. 2007)

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