

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

Samuel Clement Wendt v. Warden Benjamin Anderson, et al.

Wendt · No. 1:25CV16 · Decided February 5, 2026

SUMMARY

The document is an order, memorandum opinion, and recommendation by a United States magistrate judge in Samuel Clement Wendt’s action concerning alleged burdens on Catholic religious practice and disparate treatment of religious groups in a North Carolina correctional facility. The magistrate judge denies the motion to show cause, directs defendants to respond to the preliminary-injunction motion, recommends denying defendants’ motions to dismiss or transfer venue, and recommends sua sponte dismissal of state constitutional claims and claims asserted on behalf of other inmates. The opinion also addresses claim preclusion, issue preclusion, claim splitting, the first-to-file rule, and venue transfer.

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	February 5, 2026
DOCKET	1:25CV16
DISPOSITION	other
PROCEDURAL POSTURE	The court considered defendants' motions to dismiss or transfer venue, plaintiff's motion for a preliminary injunction, and plaintiff's motion to show cause for Rule 11 sanctions. The magistrate judge denied the motion to show cause, ordered defendants to respond to the preliminary-injunction motion, recommended denial of the motions to dismiss or transfer, and recommended sua sponte dismissal of state constitutional claims and claims asserted on behalf of other inmates.
STANDARD OF REVIEW	For supplemental jurisdiction, the court applied 28 U.S.C. § 1367(c) (1). For standing, it applied the requirements for third-party standing. For preclusion, it applied the preclusive effect required by the law of the state that rendered the judgment. Claim-splitting and first-to-file issues were evaluated under Fourth Circuit law. Rule 11 sanctions were reviewed under an objective-reasonableness standard and

	entrusted to the district court's discretion. Preliminary-injunction relief required independent judicial consideration despite the lack of a response.
PRECEDENTIAL VALUE	unknown
PARTIES	Samuel Clement Wendt v. Warden Benjamin Anderson, et al.

TOPICS

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QUESTIONS PRESENTED

1. Whether the prior North Carolina state-court dismissal triggered claim preclusion or issue preclusion.
2. Whether Wendt's related Eastern District actions barred the present action under the rule against claim splitting.
3. Whether the first-to-file rule required dismissal or priority for the Eastern District actions.
4. Whether the action or any claims should be transferred to the Eastern District of North Carolina for convenience or to prevent forum shopping.
5. Whether the court should dismiss sua sponte Wendt's North Carolina constitutional claims for lack of supplemental jurisdiction.
6. Whether Wendt had standing to assert claims on behalf of other inmates.
7. Whether Wendt's motion for Rule 11 sanctions should be granted.
8. Whether defendants should be required to respond before the court considered Wendt's preliminary-injunction motion.

HOLDINGS

1. The court should decline to exercise supplemental jurisdiction over Wendt's North Carolina constitutional-law claims because they present novel or complex questions of state constitutional law, and those claims should be dismissed without prejudice.
2. Wendt's claims asserted on behalf of other inmates should be dismissed because he did not allege the close relationship and hindrance required for third-party standing.
3. The prior state-court dismissal did not establish that claim preclusion or issue preclusion barred Wendt's federal claims.
4. The rule against claim splitting did not bar Wendt's present action.
5. The first-to-file rule did not bar the present action.

6. The court should deny defendants' request to transfer the action to the Eastern District of North Carolina.
7. The court denied Wendt's motion to show cause and request for Rule 11 sanctions because of procedural deficiencies and the discretionary determination that sanctions were unwarranted, while warning both sides about future sanctionable conduct.
8. Defendants were ordered to respond to Wendt's preliminary-injunction motion within fourteen days before the court considered the requested relief.

KEY QUOTATIONS

“The rule against claim splitting prohibits a plaintiff from prosecuting its case piecemeal and requires that all claims arising out of a single wrong be presented in one action.” (Section III.B)

“Rule 11 sanctions must differentiate between a losing argument or position, which is not sanctionable, and a frivolous one, which is.” (Section IV)

“responsive briefing may not include new motions.” (Section VII)

FACTUAL BACKGROUND

Wendt is a Catholic inmate in the North Carolina prison system who was transferred from Tabor Correctional Institution to Piedmont Correctional Institution in March 2023. He alleged that prison officials denied or limited Catholic sacraments and services, favored Protestant religious organizations, and imposed unequal restrictions on religious programs, computers, musical instruments, recreation, and educational opportunities. He also asserted claims concerning grievance responses, North Carolina constitutional rights, and alleged discrimination against other inmates' religions. Wendt had related actions pending in the Eastern District of North Carolina concerning events at Tabor and a prior state-court action involving access to computers and musical instruments.

PROCEDURAL HISTORY

Wendt, a state prisoner proceeding pro se, filed this civil-rights action concerning alleged burdens on his Catholic religious exercise and preferential treatment of Protestant religious activities at Piedmont Correctional Institution. Defendants moved to dismiss or transfer the case based on preclusion, claim splitting, the first-to-file rule, and forum-shopping considerations. Wendt also sought preliminary injunctive relief and Rule 11 sanctions. The magistrate judge issued an order and memorandum opinion and recommendation resolving the motions in part and recommending disposition of the remaining claims.

DISPOSITION

other

CASES CITED

- Jehovah v. Clarke, 798 F.3d 169, 176 (4th Cir. 2015)
- Wendt v. Bullard, 2024 WL 3955458, at *7-8 (E.D.N.C. Aug. 27, 2024)
- Brickwood Contractors, Inc. v. Datanet Engineering, Inc., 369 F.3d 385, 390 (4th Cir. 2004)

- Optolum, Inc. v. Cree, Inc., 2021 WL 8533814, at *2 (M.D.N.C. Oct. 24, 2021)
- State of Maryland v. United States Department of Agriculture, 151 F.4th 197, 212 (4th Cir. 2025)
- Kowalski v. Tesmer, 543 U.S. 125, 130 (2004)
- Migra v. Warren City School District Board of Education, 465 U.S. 75, 81 (1984)
- United States v. Ruhbayan, 325 F.3d 197, 203 (4th Cir. 2003)
- Bennett v. Garner, 913 F.3d 436, 441 (4th Cir. 2019)
- County of Rutherford By & Through Child Support Enforcement Agency ex rel. Hedrick v. Whitener, 100 N.C. App. 70, 74 (1990)
- Barrow v. D.A.N. Joint Venture Properties of N. Carolina, LLC, 232 N.C. App. 528, 531 (2014)
- Denton v. Hernandez, 504 U.S. 25, 34 (1992)
- Lee v. Norfolk Southern Railway Co., 802 F.3d 626, 635 (4th Cir. 2015)
- Sensormatic Security Corp. v. Sensormatic Electronics Corp., 273 F. App'x 256, 265 (4th Cir. 2008)
- Volvo Construction Equipment North America, Inc. v. CLM Equipment Co., Inc., 386 F.3d 581, 594-95 (4th Cir. 2004)
- Byerson v. Equifax Information Services, LLC, 467 F. Supp. 2d 627, 635-36 (E.D. Va. 2006)
- Trustees of the Plumbers & Pipefitters National Pension Fund v. Plumbing Services, Inc., 791 F.3d 436, 444 (4th Cir. 2015)
- In re Johnson, 186 F. App'x 390, 394 (4th Cir. 2006)
- DeBauche v. Trani, 191 F.3d 499, 512 (4th Cir. 1999)
- Echeverria v. Samuel I. White, P.C., 2019 WL 1375587, at *4 (E.D. Va. Feb. 12, 2019)
- ClearOne Advantage, LLC v. Kersen, 713 F. Supp. 3d 86, 88 (D. Md. 2024)

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