

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

Michael Jerome Jennings v. Christopher Smith, et al.

Jennings · No. 1:22-cv-01165-RDP · Decided June 11, 2026

SUMMARY

The opinion addresses the effect of the Alabama Supreme Court’s answer to a certified question concerning Alabama Code § 15-5-30, Alabama’s stop-and-identify statute. The court concludes that the intervening state-court decision establishes that the defendant officers had at least arguable probable cause to arrest Michael Jerome Jennings for failing to provide sufficient identifying information, entitling them to federal qualified immunity and state-agent immunity. The court therefore grants summary judgment on Jennings’s federal and state false-arrest claims.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Eastern Division
JURISDICTION	United States District Court for the Northern District of Alabama, Eastern Division
DECIDED	June 11, 2026
DOCKET	1:22-cv-01165-RDP
DISPOSITION	other
PROCEDURAL POSTURE	Following the Eleventh Circuit's reversal and remand of summary judgment and dismissal orders, the district court considered the effect of the Alabama Supreme Court's answer to a certified question concerning Alabama's stop-and-identify statute.
STANDARD OF REVIEW	Summary judgment is reviewed under Federal Rule of Civil Procedure 56; qualified immunity turns on whether the officers had actual or arguable probable cause and whether the unlawfulness of their conduct was clearly established at the time. The court also applied Rule 60(b) (6) and the intervening-change-in-controlling-law exception to the mandate and law-of-the-case doctrines.
PRECEDENTIAL VALUE	unpublished
PARTIES	Michael Jerome Jennings v. Christopher Smith, Justin Gable, Jeremy Brooks, City of Childersburg

TOPICS

qualified immunity

section 1983

civil rights

statutory interpretation

summary judgment

PRACTICE AREAS

civil rights

constitutional law

qualified immunity

state-law immunity

civil procedure

QUESTIONS PRESENTED

1. Whether the Alabama Supreme Court's answer to the certified question constituted an intervening change in controlling law permitting the district court to reconsider its prior rulings despite the mandate rule and law-of-the-case doctrine.
2. Whether, in May 2022, the officers had at least arguable probable cause and were entitled to qualified immunity for arresting Jennings after he refused to provide sufficient identifying information during a valid stop under Alabama Code § 15-5-30.
3. Whether the officers and the City of Childersburg were entitled to immunity from Jennings's state-law false-arrest claims.

HOLDINGS

1. The Alabama Supreme Court's answer to the certified question was an intervening change in controlling law because the Alabama Supreme Court is the final authority on the interpretation of Alabama statutes. The district court could therefore reconsider its prior ruling without violating the law-of-the-case doctrine or mandate rule.
2. The individual officers were entitled to qualified immunity because, in May 2022, it was not clearly established that arresting Jennings after he refused to provide sufficient identifying information during a valid stop violated Alabama Code § 15-5-30 or the Constitution. The officers had at least arguable probable cause, and likely actual probable cause, for the arrest.
3. The individual officers were entitled to Alabama State-agent immunity, and the City of Childersburg was likewise immune, because the officers had probable cause or at least arguable probable cause to arrest Jennings.

KEY QUOTATIONS

*“Alabama law is clear -- once an officer has reasonable suspicion to believe that a suspect is committing, has committed, or is about to commit a felony or other public offense, § 15-5-30 empowers the officer to demand that the suspect disclose his or her name and address in a format that would allow the officer to affirmatively identify the suspect.” (*5)*

*“Either way, the suspect bears the burden to completely identify himself or herself during a valid Terry stop; thus, failing to provide sufficient identifying information when demanded to do so violates Alabama law.” (*5)*

“The officer Defendants are entitled to qualified immunity because it was not clearly established in 2022 that their conduct violated Alabama law, specifically § 15-5-30.”

FACTUAL BACKGROUND

On May 22, 2022, police responded to a 911 call reporting a suspicious person at an elderly couple's home. Officer Christopher Smith found Jennings, an African American man, watering flowers at the residence; Jennings said he did not live there but was caring for the property and repeatedly refused to provide his full name or other identifying information. After Jennings continued walking away and arguing with the officers, they detained and arrested him, charging him with obstructing governmental operations. The 911 caller later stated that Jennings lived nearby and was probably watering the flowers, but the officers proceeded with the arrest.

PROCEDURAL HISTORY

The district court initially granted summary judgment to the individual officers on qualified-immunity grounds and dismissed the City of Childersburg from the state-law false-arrest claim. The Eleventh Circuit reversed and remanded, concluding under *Edger v. McCabe* that the officers lacked probable cause to arrest Jennings for refusing to show physical identification. On remand, the district court certified a question concerning Alabama Code § 15-5-30 to the Alabama Supreme Court, which answered that the statute permits an officer conducting a valid Terry stop to demand identifying information in a format that affirmatively identifies the suspect. The district court then applied that intervening state-law decision and again concluded that the officers and City were immune.

DISPOSITION

other

REMAND INSTRUCTIONS

The court concluded that the officer Defendants were entitled to summary judgment on the federal claims and that the state-law false-arrest claims against the officers and City were barred by immunity. A separate order was to be entered.

CASES CITED

- *Jennings v. Smith*, 2026 WL 706449 (Ala. Mar. 13, 2026)
- *Edger v. McCabe*, 84 F.4th 1230 (11th Cir. 2023)
- *Jennings v. Smith*, 2024 WL 4315127 (11th Cir. Sept. 27, 2024)
- *Metz v. Bridges*, 2024 WL 5088586 (11th Cir. Dec. 12, 2024)
- *Gilmore v. Georgia Department of Corrections*, 144 F.4th 1246, 1258 (11th Cir. 2025)
- *T.R. by and through Brock v. Lamar County Board of Education*, 25 F.4th 877, 883 (11th Cir. 2022)
- *United States v. Amedeo*, 487 F.3d 823, 830 (11th Cir. 2007)
- *United States v. Irely*, 458 F. App'x 854, 856 (11th Cir. 2012)
- *Annunziata v. School Board of Miami-Dade County, Florida*, 2005 WL 591205 (11th Cir. Mar. 4, 2005)
- *Noble v. Mitchell*, 164 U.S. 367, 372 (1896)
- *Edwards v. Kia Motors of America, Inc.*, 554 F.3d 943, 945 (11th Cir. 2009)

- *Fernandez v. Bankers National Life Insurance Co.*, 906 F.2d 559, 569 (11th Cir. 1990)
- *Naturist Society, Inc. v. Fillyaw*, 958 F.2d 1515, 1520 (11th Cir. 1992)
- *Kremens v. Bartley*, 431 U.S. 119, 135 (1977)
- *Wheeler v. City of Pleasant Grove*, 746 F.2d 1437, 1440 (11th Cir. 1984) (per curiam)
- *Ad-Vantage Telephone Directory Consultants, Inc. v. GTE Directories Corp.*, 943 F.2d 1511, 1520 (11th Cir. 1991)
- *BellSouth Telecommunications, Inc. v. Town of Palm Beach*, 252 F.3d 1169, 1192 n.16 (11th Cir. 2001)
- *Morris v. Town of Lexington, Alabama*, 748 F.3d 1316, 1324 (11th Cir. 2014)
- *Brown v. City of Huntsville*, 608 F.3d 724, 734, 741 (11th Cir. 2010)
- *Case v. Eslinger*, 555 F.3d 1317, 1326-27 (11th Cir. 2009)
- *Ex parte Harris*, 216 So. 3d 1201, 1213 (Ala. 2016)
- *Walker v. City of Huntsville*, 62 So. 3d 474, 493 (Ala. 2010)
- *Higgins v. Wal-Mart Stores, Inc.*, 512 So. 2d 766 (Ala. 1987)
- *Borders v. City of Huntsville*, 875 So. 2d 1168, 1180 (Ala. 2003)
- *Howard v. City of Atmore*, 887 So. 2d 201, 211 (Ala. 2003)
- *Shaw v. City of Selma*, 241 F. Supp. 3d 1253, 1287 (S.D. Ala. 2017), *aff'd*, 884 F.3d 1093 (11th Cir. 2018)
- *Nunez v. GEICO General Insurance Co.*, 685 F.3d 1205, 1207 (11th Cir. 2012), *certified question answered*, 117 So. 3d 388 (Fla. 2013)
- *Ruderman ex rel. Schwartz v. Washington National Insurance Corp.*, 671 F.3d 1208, 1212 (11th Cir. 2012), *certified question answered sub nom. Washington National Insurance Corp. v. Ruderman*, 117 So. 3d 943 (Fla. 2013)