

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Ryan Christopher Cheatham v. Tim Easley, et al.

Cheatham · No. 25-3218-JWL · Decided November 21, 2025

SUMMARY

The United States District Court for the District of Kansas denied Plaintiff Ryan Christopher Cheatham’s motion seeking a temporary restraining order, preliminary injunction, mandamus relief, other relief, and potentially appointment of counsel. The court found that the requested injunctive relief was insufficiently specific and unsupported by sufficiently detailed facts, declined to forward the motion as a writ of mandamus, and denied appointment of counsel without prejudice.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	John W. Lungstrum
JURISDICTION	United States District Court for the District of Kansas
DECIDED	November 21, 2025
DOCKET	25-3218-JWL
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a pro se state prisoner proceeding in forma pauperis, moved for a temporary restraining order, preliminary injunction, alternative writ of mandamus, other relief, and, as liberally construed, appointment of counsel. The district court denied the motion.
STANDARD OF REVIEW	The court evaluated the requested preliminary-injunctive relief under the clear-showing standard for extraordinary relief and considered appointment of counsel under the district court's discretionary standard for civil actions brought by indigent litigants.
PRECEDENTIAL VALUE	unpublished district court memorandum and order
PARTIES	Ryan Christopher Cheatham v. Tim Easley, et al.

TOPICS

- injunctions
- civil procedure
- prisoners rights
- section 1983
- civil rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff was entitled to a temporary restraining order or preliminary injunction based on his allegations concerning legal mail, access to the courts, and retaliation.
2. Whether the court should appoint or request volunteer counsel for Plaintiff in this civil action.
3. Whether the district court should forward Plaintiff's motion to a higher court as a petition for a writ of mandamus.

HOLDINGS

1. The motion did not warrant injunctive relief because it failed to identify with sufficient specificity the acts or parties to be restrained, did not comply with Local Rule 7.1(a)(1), and did not make a clear showing of entitlement to the extraordinary remedy of a preliminary injunction.
2. The motion for appointment of counsel was denied without prejudice because there is no constitutional right to appointed counsel in a civil case, appointment is discretionary, and Plaintiff had not shown sufficient merit or other circumstances warranting a request for volunteer counsel.
3. The district court declined to forward the motion to another court as a writ of mandamus because it would not act as Plaintiff's advocate or submit a mandamus request on his behalf.

KEY QUOTATIONS

“Additionally, a preliminary injunction is “an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.”” (Memorandum and Order, preliminary-injunction discussion)

“There is no constitutional right to appointment of counsel in a civil case.” (Memorandum and Order, appointment-of-counsel discussion)

“IT IS THEREFORE ORDERED THAT the motion (Doc. 9) is denied.” (Memorandum and Order, final disposition)

FACTUAL BACKGROUND

Ryan Christopher Cheatham, a state prisoner at El Dorado Correctional Facility, alleged that Kansas Department of Corrections staff were denying him legal mail and interfering with his access to the courts. His specific allegation concerning this action was that a nonparty staff member falsely told him that his inmate account statement had been filed, although the case was initially dismissed for failure to submit that statement. The case was reopened after Cheatham advised the court that he had relied on the staff member's assurances.

PROCEDURAL HISTORY

Plaintiff's civil action was initially dismissed on November 13, 2025, because he did not submit the required inmate account statement. After Plaintiff explained that he relied on staff assurances that the statement had been

filed, the court reopened the case on November 20, 2025. Plaintiff then filed the motion at issue, alleging interference with legal mail, denial of access to the courts, and retaliation.

DISPOSITION

other

CASES CITED

- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 22 (2008)
- Little v. Jones, 607 F.3d 1245, 1251 (10th Cir. 2010)
- Hall v. Bellmon, 935 F.2d 1106, 1110 (10th Cir. 1991)
- Carper v. DeLand, 54 F.3d 613, 616 (10th Cir. 1995)
- Johnson v. Johnson, 466 F.3d 1213, 1217 (10th Cir. 2006)
- Rachel v. Troutt, 820 F.3d 390, 396 (10th Cir. 2016)
- Williams v. Meese, 926 F.2d 994, 996 (10th Cir. 1991)
- Steffey v. Orman, 461 F.3d 1218, 1223 (10th Cir. 2006)
- Hill v. SmithKline Beecham Corp., 393 F.3d 1111, 1115 (10th Cir. 2004)
- Rucks v. Boergermann, 57 F.3d 978, 979 (10th Cir. 1995)