

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, SPRINGFIELD DIVISION

Katrina Wallace v. Henze, et al.

Wallace v. Henze, et al., No. 3:25-cv-03365 (C.D. Ill. Apr. 28, 2026) · No. 3:25-cv-03365 · Decided April 28, 2026

SUMMARY

The court grants Plaintiff Katrina Wallace leave to file an amended complaint but dismisses the existing complaint because it improperly joins unrelated claims and defendants under Federal Rule of Civil Procedure 20. The court gives Plaintiff 30 days to file a comprehensive amended complaint and denies her motion for appointment of counsel with leave to renew.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Sara Darrow
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	April 28, 2026
DOCKET	3:25-cv-03365
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights action screened under 28 U.S.C. § 1915A. The court granted leave to amend, dismissed the amended complaint for improper joinder under Federal Rule of Civil Procedure 20, and denied the motion for appointed counsel with leave to renew.
STANDARD OF REVIEW	On screening under 28 U.S.C. § 1915A, the court accepted factual allegations as true and construed them liberally in plaintiff's favor, while requiring sufficient factual matter to state a plausible claim. Joinder was assessed under Federal Rule of Civil Procedure 20. The motion for appointed counsel was evaluated under the two-step Pruitt framework.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Katrina Wallace v. Henze, et al.

TOPICS

joinder

prisoners rights

section 1983

civil procedure

motion to amend

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether plaintiff's multiple claims against different prison officials were properly joined in one action under Federal Rule of Civil Procedure 20.
2. Whether the complaint stated legally sufficient claims under the Prison Litigation Reform Act screening standard.
3. Whether plaintiff was entitled to appointed counsel or had shown a reasonable effort to obtain counsel independently.
4. Whether plaintiff should be granted leave to amend after dismissal for misjoinder.

HOLDINGS

1. The claims were improperly joined because they arose from different transactions or occurrences, involved different defendants, and did not present the required common questions of law or fact.
2. The complaint was dismissed under the court's screening authority because it presented legally insufficiently joined claims, with leave to file a compliant amended complaint.
3. The motion for appointed counsel was denied with leave to renew because plaintiff did not demonstrate a reasonable effort to obtain counsel independently.

KEY QUOTATIONS

"Unrelated claims against different defendants belong in different suits."

"Plaintiff's amended complaint is dismissed pursuant to Fed. R. Civ. P. 20."

FACTUAL BACKGROUND

Plaintiff, incarcerated at Logan Correctional Center, alleged eight claims arising on different dates and involving different defendants and factual circumstances, including failure to protect, deliberate indifference to medical needs, inhumane conditions of confinement, excessive force, and strip searches. She also asserted that she had contacted attorneys in support of her request for appointed counsel, but did not provide evidence of those efforts.

PROCEDURAL HISTORY

Plaintiff, an incarcerated pro se litigant proceeding in forma pauperis, moved to amend her complaint and requested appointed counsel. The court granted leave to amend, conducted a merit review, determined that eight unrelated claims involving different defendants and factual events were improperly joined, dismissed the

complaint with leave to file a compliant amended complaint within 30 days, and denied the request for counsel with leave to renew.

DISPOSITION

other

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. U.S., 721 F.3d 418, 422 (7th Cir. 2013)
- Dorsey v. Varga, 55 F.4th 1094, 1107 (7th Cir. 2022)
- UWM Student Ass'n v. Lovell, 888 F.3d 854, 863 (7th Cir. 2018)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Owens v. Godinez, 860 F.3d 434, 436 (7th Cir. 2017)
- Pruitt v. Mote, 503 F.3d 647, 654-55 (7th Cir. 2007)
- Balle v. Kennedy, 73 F.4th 545, 559-60 (7th Cir. 2023)
- Tackett v. Jess, 853 F. App'x 11, 16-17 (7th Cir. 2021)
- Eagan v. Dempsey, 987 F.3d 667, 682 (7th Cir. 2021)