

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

**Angela M. Boswell v. Sheriff Jeffrey Cassidy, Sullivan County Sheriff
Department, Sullivan County Jail, Aaron Blevins, Detective Daniel
Ratcliffe, Matthew Price, and John and Jane Does 1–10**

No. 2:26-CV-057-CLC-CRW · No. No. 2:26-CV-057-CLC-CRW · Decided May 14, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee dismisses Angela M. Boswell’s pro se 42 U.S.C. § 1983 action for failure to prosecute and failure to comply with a court order under Federal Rule of Civil Procedure 41(b). The court concludes that Plaintiff failed to update her address, preventing communication with the court and defendants, and certifies that any appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Curtis L. Collier
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	May 14, 2026
DOCKET	No. 2:26-CV-057-CLC-CRW
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court dismissed a pro se prisoner civil-rights complaint sua sponte under Federal Rule of Civil Procedure 41(b) for failure to prosecute and failure to comply with a court order requiring the plaintiff to maintain a current address.
STANDARD OF REVIEW	The court applied the four-factor test governing dismissal under Rule 41(b): willfulness, bad faith, or fault; prejudice to the opposing party; prior warning; and consideration of less drastic sanctions.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; precedential status not identified in the source.

TOPICS

- civil procedure
- sanctions
- section 1983
- prisoners rights
- civil rights

PRACTICE AREAS

Civil procedure

Prisoner civil rights

Dismissal for failure to prosecute

QUESTIONS PRESENTED

1. Whether the district court could sua sponte dismiss the action under Federal Rule of Civil Procedure 41(b) for failure to prosecute and failure to comply with a court order.
2. Whether the Rule 41(b) factors supported dismissal where the pro se plaintiff failed to update her address, could not be contacted, and appeared not to intend to proceed.
3. Whether Plaintiff's pro se status mitigated the failure to comply with the straightforward procedural requirement to maintain a current address.

HOLDINGS

1. A district court may sua sponte dismiss an action under Federal Rule of Civil Procedure 41(b) when a plaintiff fails to prosecute or comply with the Federal Rules or a court order.
2. Dismissal was warranted because Plaintiff's failure to update her address constituted fault, prevented communication with the Court and Defendants, occurred despite prior notifications, and made alternative sanctions unwarranted.
3. Plaintiff's pro se status did not excuse failure to comply with the straightforward requirement to update the Court with a current address or otherwise mitigate dismissal under Rule 41(b).

KEY QUOTATIONS

"On balance, the Court finds that these factors support dismissal of this action under Rule 41(b)."

"Accordingly, this action will be DISMISSED for want of prosecution and failure to comply with a Court order pursuant to Rule 41(b)."

FACTUAL BACKGROUND

Plaintiff filed a pro se prisoner complaint under 42 U.S.C. § 1983 and provided the Court with an address. After the case was transferred, mail sent to that address was returned as undeliverable or refused. Plaintiff did not notify the Court of a new address or otherwise communicate with the Court, despite a local rule requiring pro se parties to report address changes and prosecute their actions diligently.

PROCEDURAL HISTORY

The Middle District of Tennessee transferred the § 1983 action to the Eastern District of Tennessee. After transfer, mail containing the docket sheet and prior notifications was returned as undeliverable or refused because Plaintiff had not maintained a current address. Plaintiff did not communicate with the Court, and the Court dismissed the action under Rule 41(b) and certified that any appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Rogers v. City of Warren, 302 F. App'x 371, 375 n.4 (6th Cir.)
- Link v. Wabash R.R., 370 U.S. 626, 630 (1962)
- Wu v. T.W. Wang, Inc., 420 F.3d 641, 643 (6th Cir.)
- Jourdan v. Jabe, 951 F.2d 108, 109 (6th Cir.)

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