

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Stephen Baker v. A.W. Carter, et al.

Baker v. Carter, No. 3:25-cv-00435 · No. No. 3:25-cv-00435 · Decided March 11, 2026

SUMMARY

The court conducted an initial screening under the Prison Litigation Reform Act of Stephen Baker’s pro se civil-rights complaint concerning alleged failure to protect, retaliation, and denial of due process while incarcerated. It denied leave to amend, dismissed claims against A.W. Carter without prejudice, dismissed requests for injunctive and declaratory relief as moot, and dismissed the remaining claims for failure to state a claim.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	William L. Campbell Jr.
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	March 11, 2026
DOCKET	No. 3:25-cv-00435
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial screening of a pro se prisoner civil-rights complaint under the Prison Litigation Reform Act, followed by consideration of a motion to amend.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2) and 1915A, the court must dismiss a complaint that is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. Failure to state a claim is evaluated under the plausibility standard applicable to Federal Rule of Civil Procedure 12(b)(6), accepting well-pleaded factual allegations as true and construing a pro se pleading liberally.
PRECEDENTIAL VALUE	Unpublished district-court memorandum opinion and order; persuasive but not binding beyond the case.
PARTIES	Stephen Baker v. A.W. Carter, et al.

TOPICS

prisoners rights

section 1983

civil rights

first amendment

due process

PRACTICE AREAS

Civil rights

Prisoner civil rights

Constitutional law

Federal civil procedure

QUESTIONS PRESENTED

1. Whether Baker should be permitted to amend his complaint to drop all claims against A.W. Carter.
2. Whether the proposed amended complaint complied with Federal Rule of Civil Procedure 8(a)(3).
3. Whether Baker plausibly alleged an Eighth Amendment failure-to-protect claim.
4. Whether Baker plausibly alleged a First Amendment retaliation claim.
5. Whether Baker plausibly alleged a Fourteenth Amendment procedural due process claim based on his disciplinary conviction and twenty-day segregation term.
6. Whether his requests for injunctive and declaratory relief were moot after his transfer to another facility.

HOLDINGS

1. A party may be dropped on just terms under Federal Rule of Civil Procedure 21, and Baker's request to drop all claims against Carter was granted; those claims were dismissed without prejudice.
2. Leave to amend was denied because the proposed amended complaint did not identify any defendants or request relief and therefore failed to comply with Federal Rule of Civil Procedure 8(a)(3).
3. Baker failed to state an Eighth Amendment failure-to-protect claim because he did not plausibly allege an objectively substantial risk of serious harm from his cell assignment or that any defendant was subjectively aware of and deliberately indifferent to such a risk.
4. Baker failed to state a First Amendment retaliation claim because he did not allege that Smith or Jameson took an adverse action against him because of protected conduct, including any failure to protect him.
5. Baker's claims for injunctive and declaratory relief were dismissed as moot because he had been transferred to another facility.
6. Baker failed to state a due process claim based on the denial of his disciplinary appeal because twenty days in punitive segregation, without more, did not impose an atypical and significant hardship creating a protected liberty interest.

KEY QUOTATIONS

"For a failure-to-protect claim to lie against a prison official, the plaintiff must show that: (1) 'objectively,' he was 'incarcerated under conditions posing a substantial risk of serious harm' and (2) the official acted with 'deliberate indifference' to inmate safety, meaning the official was 'subjectively aware of the risk' and 'failed to take reasonable measures to abate it.'" (Section IV.A)

"First, that he engaged in protected conduct. Second, that [Defendant] took an adverse action against him. And third, that the adverse action was taken (at least in part) because of the protected conduct." (Section IV.B)

"The Fourteenth Amendment prohibits any State from depriving a person of life, liberty, or property without due process of law." (Section IV.C)

FACTUAL BACKGROUND

Baker alleged that he was assaulted and stabbed by gang members, requested protective custody, and was later placed in housing where his cellmate allegedly threatened him with a knife and attempted to sexually assault him. He alleged that prison officials failed to protect him, that officials retaliated after his complaints and contacts with investigators and the media, and that a disciplinary appeal was denied after he received twenty days in punitive segregation. He sought declaratory relief, injunctive relief, and damages, but had been transferred to another facility.

PROCEDURAL HISTORY

Stephen Baker filed a civil-rights complaint concerning alleged assaults, failure to protect, retaliation, and disciplinary proceedings while incarcerated. He moved for leave to file an amended complaint to drop all claims against A.W. Carter. The court granted the request to drop Carter and dismissed those claims without prejudice, denied leave to amend because the proposed pleading did not comply with Federal Rule of Civil Procedure 8(a)(3), and dismissed the remaining claims during PLRA screening.

DISPOSITION

dismissed

CASES CITED

- Reedy v. West, 988 F.3d 907, 912 (6th Cir. 2021)
- Farmer v. Brennan, 511 U.S. 825, 833-34 (1994)
- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Tackett v. M & G Polymers, USA, LLC, 561 F.3d 478, 488 (6th Cir. 2009)
- Wilson v. Yaklich, 148 F.3d 596, 601 (6th Cir. 1998)
- Hardrick v. Huss, 155 F.4th 518, 525 (6th Cir. 2025)
- Meachum v. Fano, 427 U.S. 215, 223 (1976)
- McMillan v. Fielding, 136 F. App'x 818, 820 (6th Cir. 2005)
- Sandin v. Conner, 515 U.S. 472, 484, 486 (1995)

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