

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

Karl Williams, III v. Caleb Cathey, et al.

Williams v. Cathey · No. 2:26-cv-00027 · Decided June 12, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee grants Karl Williams, III’s amended application to proceed in forma pauperis and conducts an initial screening of his amended civil-rights complaint arising from a traffic stop, arrest, search, and alleged use of excessive force. The court permits the individual-capacity federal claims against three deputies and the related state-law claims to proceed, but dismisses the sheriff and all official-capacity claims for failure to plausibly plead municipal liability. The court also denies without prejudice the plaintiff’s motion for leave to file a third amended complaint because no proposed pleading was attached.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Northeastern Division
JURISDICTION	United States District Court for the Middle District of Tennessee, Northeastern Division
DECIDED	June 12, 2026
DOCKET	2:26-cv-00027
DISPOSITION	other
PROCEDURAL POSTURE	Initial screening of a pro se plaintiff's amended complaint under 28 U.S.C. § 1915(e)(2), together with consideration of an amended in forma pauperis application and a motion for leave to file a third amended complaint.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis complaint that is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The pleading must contain sufficient factual allegations to state a claim that is plausible on its face, while pro se pleadings are liberally construed and well-pleaded factual allegations are accepted as true.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court memorandum opinion and order

TOPICS

section 1983 civil rights motions to dismiss service of process municipal liability

PRACTICE AREAS

civil rights civil procedure constitutional law torts

QUESTIONS PRESENTED

1. Whether Plaintiff qualified to proceed in forma pauperis under 28 U.S.C. § 1915(a).
2. Whether the amended complaint stated plausible federal and pendent state-law claims against the deputies in their individual capacities at the initial-screening stage.
3. Whether the amended complaint plausibly alleged municipal liability against the sheriff in his official capacity and against the deputies in their official capacities.
4. Whether Plaintiff's motion for leave to file a third amended complaint complied with the local rule requiring an attached proposed amended pleading.

HOLDINGS

1. Plaintiff's amended application sufficiently demonstrated that he could not pay the civil filing fee in advance without undue hardship, so the amended IFP application was granted and the original application was denied as moot.
2. The federal claims against Defendants Cathey, Early, and Richardson in their individual capacities, and the pendent state-law claims, were sufficiently pleaded to proceed beyond initial review.
3. The official-capacity claims against Cathey, Early, and Richardson and the claim against Sheriff Cox were dismissed because the complaint did not plausibly allege that a specific Cumberland County policy or custom was the moving force behind a constitutional deprivation.
4. The motion for leave to file a third amended complaint was denied without prejudice because Plaintiff did not attach the proposed amended complaint as required by Local Rule 15.01(a)(1).

KEY QUOTATIONS

“To avoid dismissal for failure to state a claim, the Amended Complaint must contain sufficient factual allegations to render a right to relief “plausible on its face,”” (II.A. LEGAL STANDARD)

“The claims against the Cumberland County Sheriff and his deputies in their official capacity, however, are effectively claims against Cumberland County.” (II.C. ANALYSIS)

“The Motion therefore fails to comply with Local Rule 15.01, which requires that “the signed proposed amended pleading” be attached “as an appended exhibit.”” (III. CONCLUSION)

FACTUAL BACKGROUND

Plaintiff alleged that on April 19, 2025, Defendant Caleb Cathey stopped him on Interstate 40 in Crossville, Tennessee, purportedly for a traffic violation, although no citation was issued. Plaintiff alleged that Cathey

arrested him for suspected DUI, used excessively tight handcuffs causing a wrist injury, and that officers detained him and searched his vehicle without finding contraband. Plaintiff further alleged that the officers lacked probable cause, that Cathey's report falsely accused him of drug-related conduct, and that the DUI charge was later dismissed.

PROCEDURAL HISTORY

Plaintiff filed a § 1983 complaint and an application to proceed in forma pauperis. He later amended the IFP application, filed an amended complaint as of right, and moved for leave to file a third amended complaint without attaching the proposed pleading. The court granted the amended IFP application, denied the original application as moot, allowed the individual-capacity claims against three deputies to proceed, dismissed the sheriff and all official-capacity claims, and denied the motion to amend without prejudice.

DISPOSITION

other

CASES CITED

- Foster v. Cuyahoga Dep't of Health and Human Servs., 21 F. App'x 239, 240 (6th Cir. 2001)
- Ongori v. Hawkins, No. 16-2781, 2017 WL 6759020, at *1 (6th Cir. Nov. 15, 2017)
- Small v. Brock, 963 F.3d 539, 540 (6th Cir. 2020)
- Ashcroft v. Iqbal, 556 U.S. 662, 678–79 (2009)
- Hill v. Lappin, 630 F.3d 468, 470–71 (6th Cir. 2011)
- Carl v. Muskegon Cnty., 763 F.3d 592, 595 (6th Cir. 2014)
- Nat'l Rifle Ass'n of Am. v. Vullo, 602 U.S. 175, 181 (2024)
- Inner City Contracting, LLC v. Charter Twp. of Northville, Michigan, 87 F.4th 743, 749 (6th Cir. 2023)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Jones v. City of Elyria, Ohio, 947 F.3d 905, 917 (6th Cir. 2020)
- Bracken v. Manor Twp., 665 F. Supp. 3d 675, 691 (W.D. Pa. 2023), aff'd sub nom. Bracken v. Twp. of Manor, No. 23-1763, 2024 WL 4210535 (3d Cir. Sept. 17, 2024)
- Williams v. City of Grand Rapids, 672 F. Supp. 3d 395, 407 (W.D. Mich. 2023)
- Alkire v. Irving, 330 F.3d 802, 810 (6th Cir. 2003)
- Okolo v. Metro. Gov't of Nashville, 892 F. Supp. 2d 931, 941, 943 (M.D. Tenn. 2012)
- Miller v. Sanilac County, 606 F.3d 240, 254–55 (6th Cir. 2010)
- Patterson v. City of Clarksville, No. 3:23-cv-00682, 2025 WL 3048999, at *5 (M.D. Tenn. Oct. 31, 2025)
- Hutchison v. Metro. Gov't of Nashville & Davidson Cnty., 685 F. Supp. 2d 747, 751 (M.D. Tenn. 2010)
- Ouza v. City of Dearborn Heights, Michigan, 969 F.3d 265, 286–89 (6th Cir. 2020)
- Birgs v. City of Memphis, 686 F. Supp. 2d 776, 780–81 (W.D. Tenn. 2010)
- Merriweather v. City of Memphis, 107 F.3d 396, 398 (6th Cir. 1997)

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