

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Charles Wallis, Christopher B. Goins, and Mark Wells v. Jefferson
County Jail Staff, J. Coffey, and Amber Manning

Wallis · No. 3:26-CV-247-TAV-DCP · Decided June 1, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee considers a pro se 42 U.S.C. § 1983 complaint challenging 23-hour-per-day lockdown conditions at the Jefferson County Jail. The court dismisses the two additional plaintiffs who did not sign the complaint, grants Charles Wallis leave to proceed in forma pauperis, and dismisses the action without prejudice for failure to state a claim. The court concludes that 23-hour lockdown confinement, as alleged, does not constitute an atypical and significant hardship or an extreme deprivation of basic necessities.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Thomas A. Varlan
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	June 1, 2026
DOCKET	3:26-CV-247-TAV-DCP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983 screened on the court's own initiative under the Prison Litigation Reform Act; the court also considered the signed plaintiff's motion to proceed in forma pauperis.
STANDARD OF REVIEW	The court applied the PLRA screening standards under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, evaluating whether the complaint was frivolous, malicious, failed to state a plausible claim, or sought relief from an immune defendant. Pro se allegations were liberally construed.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; precedential status unknown

PARTIES

Charles Wallis, Christopher B. Goins, Mark Wells v. Jefferson County Jail Staff, J. Coffey, Amber Manning

TOPICS

prisoners rights

section 1983

joinder

pleadings

civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether prisoners who did not sign the complaint or seek in forma pauperis status could proceed as plaintiffs in the same action.
2. Whether the complaint stated a plausible constitutional claim under 42 U.S.C. § 1983 based on confinement in a 23-hours-per-day lockdown and resulting depression-medication use.
3. Whether Wallis should be permitted to amend the complaint to supply a demand for relief.

HOLDINGS

1. Goins and Wells could not proceed as plaintiffs because they did not sign the complaint or otherwise demonstrate that they were actively pursuing the action; the court therefore dismissed them from the case.
2. The complaint failed to state a plausible claim under § 1983 because confinement to a cell for 23 hours per day, without additional facts showing an extreme deprivation or atypical and significant hardship, did not establish a constitutional violation.
3. The court declined to permit amendment because the complaint's substantive allegations failed to state a plausible claim even apart from its failure to include a demand for relief.
4. Wallis was granted leave to proceed in forma pauperis, but he remained responsible for the \$350 civil filing fee, payable through the statutory inmate-account collection procedure.

KEY QUOTATIONS

“Specifically, as set forth above, Plaintiff Wallis’s only substantive claim is that he is confined to his cell for 23 hours per day. However, this type of confinement “does not rise to the level of a constitutional magnitude.””

“Accordingly, the complaint fails to state a plausible claim for violation of § 1983, and this action will be DISMISSED.”

FACTUAL BACKGROUND

Wallis alleged that the Jefferson County Jail had confined him to a 23-hours-in-cell, 1-hour-out-of-cell lockdown since December 4, 2025, despite the jail rule book not expressly providing for that schedule. He alleged that the

lockdown contributed to depression medication use and that other jails operated differently. The complaint named the jail staff, the county sheriff, and a lieutenant but did not request specific relief.

PROCEDURAL HISTORY

The complaint listed three prisoners as plaintiffs, but only Charles Wallis signed the complaint and sought in forma pauperis status. The court treated Wallis as the sole plaintiff, dismissed Goins and Wells from the action, granted Wallis leave to proceed in forma pauperis subject to statutory fee collection, and dismissed the complaint without prejudice for failure to state a claim.

DISPOSITION

dismissed

CASES CITED

- United Mine Workers of Am. v. Gibbs, 383 U.S. 715, 724 (1966)
- McLaurin v. Bagley, No. 2:17-CV-11263, 2017 WL 1738031, at *5 (E.D. Mich. May 4, 2017)
- Benson v. O'Brian, 179 F.3d 1014 (6th Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corporation v. Twombly, 550 U.S. 544 (2007)
- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2010)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Argue v. Hofmeyer, 80 F. App'x 427, 429 (6th Cir. 2003)
- Sandin v. Conner, 515 U.S. 472, 484-86 (1995)
- Hudson v. McMillan, 503 U.S. 1, 8-9 (1992)