

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Davis v. Sathre

No. 2:25-cv-02597-APG-MDC (D. Nev. Dec. 29, 2025) · No. 2:25-cv-02597-APG-MDC · Decided December 29, 2025

SUMMARY

The United States District Court for the District of Nevada denied Jaimie Davis’s application to proceed in forma pauperis without prejudice because the submitted short-form application contained insufficient and unclear financial information. The court ordered Davis to submit a completed long-form application or pay the \$405 filing fee by January 26, 2026, and struck her duplicate application from the docket.

CASE DETAILS

COURT	United States District Court for the District of Nevada
WRITING FOR THE COURT	Maximiliano D. Couvillier, III
JURISDICTION	United States District Court for the District of Nevada
DECIDED	December 29, 2025
DOCKET	2:25-cv-02597-APG-MDC
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to proceed in forma pauperis in a civil action. The district court denied the application without prejudice, struck a duplicate application, and required plaintiff either to file a compliant long-form application or pay the filing fee.
STANDARD OF REVIEW	The court may conduct a factual inquiry into an applicant's financial status and has discretion to deny an in forma pauperis request when the applicant fails to adequately verify poverty or misrepresents assets.
PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value.
PARTIES	Jaimie Davis v. Curtis J. Sathre, III, et al.

TOPICS

- civil procedure
- motions to dismiss

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether plaintiff's short-form in forma pauperis application provided sufficient information for the court to determine whether she was unable to pay the filing fee.
2. Whether the duplicate in forma pauperis application should be stricken from the docket.

HOLDINGS

1. The court could not determine plaintiff's in forma pauperis status because the application contained material omissions and unexplained financial information; the application was therefore properly denied without prejudice.
2. The duplicate in forma pauperis application was stricken from the docket.

KEY QUOTATIONS

“there is no formula set forth by statute, regulation, or case law to determine when someone is poor enough to earn IFP status.” (1)

“with some particularity, definiteness and certainty.” (1)

FACTUAL BACKGROUND

Plaintiff's short-form application stated that she owned a \$550,000 house subject to a \$521,330 mortgage and incurred approximately \$2,907 in monthly housing-related payments. She reported \$32,430 in credit-card debt, no income, and \$983 in bank accounts, but did not clarify the home's purchase date or current value, explain how she paid her expenses, identify any vehicles or transportation, or answer the question concerning dependents. Plaintiff also filed a duplicate in forma pauperis application.

PROCEDURAL HISTORY

Jaimie Davis filed a short-form application to proceed in forma pauperis and later filed a duplicate application. The court found the original application too vague and deficient to determine plaintiff's financial eligibility, denied it without prejudice, struck the duplicate from the docket, and granted plaintiff until January 26, 2026, to submit a new application or pay the full filing fee.

DISPOSITION

other

CASES CITED

- Escobedo v. Applebees, 787 F.3d 1226, 1235 (9th Cir. 2015)
- Adkins v. E.I. DuPont de Nemours & Co., 335 U.S. 331, 339 (1948)
- United States v. McQuade, 647 F.2d 938, 940 (9th Cir. 1981)

- *Marin v. Hahn*, 271 F. App'x 578 (9th Cir. 2008)
- *Kennedy v. Huibregtse*, 831 F.3d 441, 443-44 (7th Cir. 2016)
- *Greco v. NYE Cty. Dist. Judge Robert Lane*, No. 2:15-cv-001370-MMD-PAL, 2016 WL 7493981, at *3 (D. Nev. Nov. 9, 2016)
- *Greco v. Lake*, No. 2:15-cv-001370-MMD-PAL, 2016 WL 7493963 (D. Nev. Dec. 30, 2016)
- *Thomas v. Arn*, 474 U.S. 140, 142 (1985)
- *Martinez v. Ylst*, 951 F.2d 1153, 1157 (9th Cir. 1991)
- *Britt v. Simi Valley United Sch. Dist.*, 708 F.2d 452, 454 (9th Cir. 1983)

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