

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
MISSISSIPPI, ABERDEEN DIVISION

Tracy Miller Arnold v. City of Guntown; Andrew Stuart

No. 1:25-CV-24-GHD-DAS · No. No. 1:25-CV-24-GHD-DAS · Decided February 2, 2026

SUMMARY

The United States District Court for the Northern District of Mississippi granted the defendants’ motion for judgment on the pleadings and dismissed Tracy Miller Arnold’s claims under 42 U.S.C. § 1983. The court held that City Prosecutor Andrew Stuart was entitled to absolute prosecutorial immunity in his individual capacity and that Arnold failed to plead a municipal policy or custom supporting liability against the City of Guntown or Stuart in his official capacity. The court also overruled Arnold’s objections to the magistrate judge’s denial of her motion to strike the defendants’ affirmative defenses and denied her motion for partial summary judgment.

CASE DETAILS

COURT	United States District Court for the Northern District of Mississippi, Aberdeen Division
JURISDICTION	United States District Court for the Northern District of Mississippi, Aberdeen Division
DECIDED	February 2, 2026
DOCKET	No. 1:25-CV-24-GHD-DAS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c). Plaintiff also moved for partial summary judgment and objected under Rule 72(a) to a magistrate judge's order denying her motion to strike defendants' affirmative defenses.
STANDARD OF REVIEW	A Rule 12(c) motion is evaluated under the same standard as a Rule 12(b)(6) motion, accepting well-pleaded factual allegations as true and asking whether the complaint states a facially plausible claim. A magistrate judge's nondispositive order is reviewed under the clearly erroneous or contrary to law standard under Federal Rule of Civil Procedure 72(a) and 28 U.S.C. § 636(b)(1)(A).
PRECEDENTIAL VALUE	unpublished

PARTIES

Tracy Miller Arnold v. City of Guntown, Andrew Stuart, in his official and individual capacities

TOPICS

motion for judgment on the pleadings

section 1983

municipal liability

affirmative defenses

appellate procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

municipal law

appellate procedure

QUESTIONS PRESENTED

1. Whether the City Prosecutor was entitled to absolute prosecutorial immunity from Arnold's individual-capacity claims based on his representation of the City in county-court proceedings and related conduct.
2. Whether Arnold adequately pleaded municipal liability against the City of Guntown or against Stuart in his official capacity under Monell and its progeny.
3. Whether the complaint adequately invoked the single-incident theory of municipal liability by alleging that Stuart was a final policymaker.
4. Whether the magistrate judge's order denying Arnold's motion to strike defendants' affirmative defenses was clearly erroneous or contrary to law.
5. Whether defendants were entitled to judgment on the pleadings and whether Arnold was entitled to partial summary judgment.

HOLDINGS

1. Andrew Stuart was entitled to absolute prosecutorial immunity because the conduct alleged arose from his advocacy and representation of the City in judicial and appellate proceedings and was intimately associated with the judicial phase of the criminal process.
2. Arnold failed to state a municipal-liability claim against the City of Guntown or Stuart in his official capacity because she did not adequately allege an official policy or custom, a policymaker's actual or constructive knowledge, and a constitutional violation caused by that policy or custom.
3. Arnold did not adequately plead the single-incident exception to municipal liability because she did not establish that Stuart was a final policymaker under Mississippi law.
4. Negligence is not a basis for municipal liability under 42 U.S.C. § 1983, and the City is not vicariously liable for Stuart's alleged negligence.
5. The magistrate judge's order denying Arnold's motion to strike defendants' affirmative defenses was not clearly erroneous or contrary to law and was properly affirmed. Defendants were required only to provide fair notice and adequately stated their affirmative defenses without detailed factual allegations.

KEY QUOTATIONS

“A Rule 12(c) motion is governed by the same standards as a Rule 12(b)(6) motion.” (at 2)

“Prosecutors are absolutely immune from liability for initiating prosecutions and other acts ‘intimately associated with the judicial phase of the criminal process.’” (at 4)

“Thus, there is no respondeat superior liability under § 1983; rather, the key to municipal liability is demonstrating that a deprivation of a constitutional right was inflicted pursuant to an official policy or custom of the municipality in question.” (at 5)

“The Defendants were not required to plead detailed factual assertions in their affirmative defenses, they complied with the relevant pleading standards, and the court thus finds no basis to strike the Defendants’ affirmative defenses.” (at 8)

FACTUAL BACKGROUND

In March 2017, the City of Guntown issued Tracy Miller Arnold three traffic citations for driving without a driver's license, driving without a tag, and failing to produce proof of valid insurance. She was convicted in municipal court and assessed fines totaling \$1,463.75, but the charges were dismissed by the Lee County Court in July 2023 after an appeal that lasted nearly six years. During the appeal, a collection agency acting for the City sent letters seeking the fines and stating that municipal-court arrest warrants had been issued. Arnold sued under 42 U.S.C. § 1983, alleging violations of the First, Fourth, Sixth, and Fourteenth Amendments.

PROCEDURAL HISTORY

Plaintiff filed a 42 U.S.C. § 1983 action against the City of Guntown and City Prosecutor Andrew Stuart based on events arising from municipal traffic citations, subsequent collection efforts, and related county-court proceedings. Defendants moved for judgment on the pleadings. The district court granted that motion and dismissed the claims, denied plaintiff's motion for partial summary judgment, and overruled plaintiff's objections while affirming the magistrate judge's order denying the motion to strike affirmative defenses.

DISPOSITION

dismissed

CASES CITED

- Brown v. CitiMortgage, Inc., 472 F. App'x 302, 303 (5th Cir. 2012)
- St. Paul Mercury Insurance Co. v. Williamson, 224 F.3d 425, 440 n.8 (5th Cir. 2000)
- Hebert Abstract Co. v. Touchstone Properties, Ltd., 914 F.2d 74, 76 (5th Cir. 1990)
- Walker v. Webco Industries, Inc., 562 F. App'x 215, 216-17 (5th Cir. 2014)
- Kennedy v. Chase Manhattan Bank USA, N.A., 369 F.3d 833, 839 (5th Cir. 2004)
- Phillips v. City of Dallas, 781 F.3d 772, 775-76 (5th Cir. 2015)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56, 570 (2007)
- Webb v. Morella, 522 F. App'x 238, 241 (5th Cir. 2013)

- *City of Clinton v. Pilgrim's Pride Corp.*, 632 F.3d 148, 152-53 (5th Cir. 2010)
- *Fernandez-Montes v. Allied Pilots Association*, 987 F.2d 278, 284 (5th Cir. 1993)
- *Emesowum v. Houston Police Department*, 561 F. App'x 372, 372 (5th Cir. 2014)
- *Imbler v. Pachtman*, 424 U.S. 409, 419 n.13, 430-31 (1976)
- *Johnson v. Kegans*, 870 F.2d 992, 996 (5th Cir. 1989)
- *Ramsey v. Smith*, No. 1:19cv54, 2020 WL 6038056, at *4 (S.D. Miss. Apr. 28, 2020)
- *Boyd v. Biggers*, 31 F.3d 279, 285 (5th Cir. 1994)
- *Burns v. Reed*, 500 U.S. 478, 486 (1991)
- *Wooten v. Roach*, 964 F.3d 395, 407 (5th Cir. 2020)
- *Wearry v. Foster*, 33 F.4th 260, 266 (5th Cir. 2022)
- *Singleton v. Cannizzaro*, 956 F.3d 773, 780 (5th Cir. 2020)
- *Buckley v. Fitzsimmons*, 509 U.S. 259, 272-73 (1993)
- *Moon v. City of El Paso*, 906 F.3d 352, 359 (5th Cir. 2018)
- *Quinn v. Roach*, 326 F. App'x 280, 292 (5th Cir. 2009)
- *Oliver v. Collins*, 904 F.2d 278, 281 (5th Cir. 1990)
- *Connick v. Thompson*, 563 U.S. 51, 60 (2011)
- *Monell v. Department of Social Services*, 436 U.S. 658, 694 (1978)
- *Piotrowski v. City of Houston*, 237 F.3d 567, 578 (5th Cir. 2001)
- *Rivera v. Houston Independent School District*, 349 F.3d 244, 247-49 (5th Cir. 2003)
- *McGregory v. City of Jackson*, 335 F. App'x 446, 448-49 (5th Cir. 2009)
- *Johnson v. Harris County*, 83 F.4th 941, 946-47 (5th Cir. 2023)
- *Peterson v. City of Fort Worth*, 588 F.3d 838, 851 (5th Cir. 2009)
- *Brown v. Bryan County*, 219 F.3d 450, 457 (5th Cir. 2000)
- *Webb v. Town of St. Joseph*, 925 F.3d 209, 215 (5th Cir. 2019)
- *Valle v. City of Houston*, 613 F.3d 536, 542 (5th Cir. 2010)
- *Hinojosa v. Tarrant County*, No. 3:07CV1912, 2009 WL 1309218, at *8 (N.D. Tex. May 5, 2009)
- *Sockwell v. Calhoun City*, No. 3:19CV4-GHD-RP, 2019 WL 3558173, at *2 (N.D. Miss. Aug. 5, 2019)
- *A. v. Bank & Trust Co. of Opelousas v. Dent*, 982 F.2d 917, 921 (5th Cir. 1993)
- *Will v. Michigan Department of State Police*, 491 U.S. 58, 71 (1989)
- *Daniels v. Williams*, 474 U.S. 327, 328 (1986)
- *Batiste v. Gusman*, No. 13-96, 2013 WL 6095833, at *1 (E.D. La. 2013)
- *Moore v. Ford Motor Co.*, 755 F.3d 802, 806, 808 n.15 (5th Cir. 2014)
- *Haines v. Liggett Group, Inc.*, 975 F.2d 81, 91 (3d Cir. 1992)
- *United States v. U.S. Gypsum Co.*, 333 U.S. 364, 395 (1948)
- *Rogers v. McDorman*, 521 F.3d 381, 385 (5th Cir. 2008)
- *Woodfield v. Bowman*, 193 F.3d 354, 362 (5th Cir. 1999)

- BNY Mellon, N.A. v. Affordable Holdings, Inc., No. 1:09-CV-00226-SA-JAD, 2010 WL 3717600, at *1-2 (N.D. Miss. Sept. 14, 2010)

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