

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

James Isiah Macon v. Sergeant Garner and YesCare Corp.

Macon · No. 2:24-CV-63-WKW · Decided January 20, 2026

SUMMARY

The United States District Court for the Middle District of Alabama denied James Isiah Macon’s motion for leave to further amend his amended inmate civil-rights complaint. The court held that the motion was untimely and that the proposed allegations concerning a stabbing and retaliatory disciplinary charges would be futile because they were conclusory, improperly joined, and did not connect the alleged conduct to the existing defendants.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	W. Keith Watkins
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	January 20, 2026
DOCKET	2:24-CV-63-WKW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for leave to further amend his amended inmate civil-rights complaint to add allegations concerning a stabbing incident, retaliation, and potentially new defendants. The defendants opposed the motion. The district court denied leave to amend.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	James Isiah Macon v. Sergeant Garner, YesCare Corp.

TOPICS

- motion to amend
- joinder
- section 1983
- pleadings
- civil procedure

PRACTICE AREAS

- Civil procedure
- Civil rights
- Prisoner litigation

QUESTIONS PRESENTED

1. Whether Plaintiff could amend his complaint as a matter of course under Federal Rule of Civil Procedure 15(a)(1).
2. Whether leave to amend should be granted under Federal Rule of Civil Procedure 15(a)(2) despite the untimeliness of the motion.
3. Whether the proposed amendment was futile because the allegations were conclusory, failed to establish the defendants' responsibility, and did not satisfy Rule 20's transaction-or-occurrence and common-question requirements.

HOLDINGS

1. Plaintiff could not amend as a matter of course because the 21-day period following the defendants' answers had expired.
2. Leave to amend was properly denied because Plaintiff's motion was untimely and the proposed amendment would be futile.
3. The proposed stabbing claim could not be joined because it did not arise from the same transaction, occurrence, or series of transactions or occurrences and did not present a question of law or fact common to all defendants.

KEY QUOTATIONS

“denial of leave to amend is justified by futility when the complaint as amended is still subject to dismissal.”

FACTUAL BACKGROUND

Plaintiff sought to add allegations that another inmate stabbed him on June 7, 2024, as well as allegations that he received retaliatory disciplinary charges related to filing this lawsuit. The proposed allegations were supported in part by medical documentation concerning puncture wounds and lacerations, but Plaintiff did not specify how either existing defendant caused or was legally responsible for the incidents. The proposed stabbing claim also concerned an event unrelated to the claims in the existing amended complaint.

PROCEDURAL HISTORY

The action was initiated in February 2024, and Plaintiff amended his complaint before service. Sergeant Garner answered on December 9, 2024, and YesCare Corp. answered on February 20, 2025, causing Plaintiff's period to amend as a matter of course under Rule 15(a)(1)(B) to expire. After entry of a Reset Scheduling Order on May 30, 2025, Plaintiff filed his motion to amend on September 8, 2025. The court denied the motion as untimely and futile.

DISPOSITION

other

CASES CITED

- In re Engle Cases, 767 F.3d 1082, 1108–09 (11th Cir. 2014)
- Hall v. United Ins. Co. of Am., 367 F.3d 1255, 1263 (11th Cir. 2004)
- Burger King Corp. v. Weaver, 169 F.3d 1310, 1320 (11th Cir. 1999)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-middle-district-of-alab/2026/james-isiah-macon-v-sergeant-garner-and-yescare-corp-h6134zm0>