

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Cristin D. Taylor, Sr. v. Akron Police Department, et al.

Taylor v. Akron Police Department · No. 5:25-cv-2704 · Decided February 5, 2026

SUMMARY

The United States District Court for the Northern District of Ohio denied pro se plaintiff Cristin D. Taylor, Sr.’s motion for appointment of counsel in his 42 U.S.C. § 1983 action against the Akron Police Department and related defendants. The court held that Taylor had not demonstrated the exceptional circumstances required for appointed counsel because the claims were not unusually complex and his lack of legal training and financial hardship were insufficient.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Sara Lioi
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	February 5, 2026
DOCKET	5:25-cv-2704
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action and moved for appointment of counsel.
STANDARD OF REVIEW	The court applied the exceptional-circumstances standard governing appointment of counsel in civil cases, considering the type and complexity of the case and the plaintiff's ability to represent himself.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion and order; nonprecedential.
PARTIES	Cristin D. Taylor, Sr. v. Akron Police Department, Akron police officers, City of Akron, Mayor of Akron, Akron Municipal Prosecutor's Office

TOPICS

civil rights

section 1983

civil procedure

PRACTICE AREAS

Civil rights

Federal civil procedure

Appointment of counsel

QUESTIONS PRESENTED

1. Whether exceptional circumstances justified appointing counsel for the pro se plaintiff in this civil § 1983 action.

HOLDINGS

1. A civil litigant has no constitutional right to appointed counsel, and appointment under 28 U.S.C. § 1915(e) is warranted only in exceptional circumstances. Taylor's lack of legal training, indigence, and generalized assertions about the difficulty of proceeding pro se did not establish exceptional circumstances, so the motion for appointment of counsel was denied.

KEY QUOTATIONS

“Rather, the authority to make such an appointment derives from 28 U.S.C. § 1915(e), and the right “is a privilege that is justified only by exceptional circumstances.”” (at 2)

“Ultimately, Taylor has failed to point to any extraordinary circumstances that would warrant the appointment of counsel.” (at 4)

FACTUAL BACKGROUND

Taylor operated a bar in Akron, Ohio, where Akron police officers responded to an incident on December 16, 2023. He alleged that officers entered the premises without a warrant or legally sufficient justification and used physical force against him, causing injuries. Taylor was later charged in Akron Municipal Court with hindering an inspection, obstructing official business, and resisting arrest, and then filed this § 1983 action.

PROCEDURAL HISTORY

Taylor filed this civil-rights action on December 12, 2025, alleging unlawful entry and seizure, excessive force, malicious prosecution, fabrication of evidence, municipal liability, prosecutorial misconduct, and fraud upon the Court. He filed a motion for appointment of counsel on December 16, 2025. The district court denied the motion.

DISPOSITION

other

REMAND INSTRUCTIONS

None. The motion for appointment of counsel was denied.

CASES CITED

- Lavado v. Keohane, 992 F.2d 601, 605-06 (6th Cir. 1993)
- Lanier v. Bryant, 332 F.3d 999, 1006 (6th Cir. 2003)
- Redd v. Conway, 160 F. App'x 858, 863 (11th Cir. 2005)
- Buchanan v. Lee, 618 F. Supp. 3d 707, 712 (M.D. Tenn. 2022)
- Mackey v. DiCaprio, 312 F. Supp. 2d 580, 582 (S.D.N.Y. 2004)
- Hymas v. United States Dep't of State, No. 3:23-cv-336, 2025 WL 1136067, at *3 (E.D. Tenn. Apr. 17, 2025)
- Edwards v. Simpson, 833 F.2d 1012 (6th Cir. 1987)
- Brubaker v. Barrett, 801 F. Supp. 2d 743, 763 (E.D. Tenn. 2011)
- Horacek v. Carter, No. 1:20-cv-11682, 2022 WL 21841898, at *2 (E.D. Mich. July 15, 2022)
- Cavin v. Michigan Department of Corrections, Cavin v. Michigan Dep't of Corr., 927 F.3d 455, 461 (6th Cir. 2019)

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