

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
KENTUCKY, PADUCAH DIVISION

Joel Michael Sibert v. City of Murray, Kentucky et al.

Sibert · No. 5:25-CV-209-JHM · Decided May 6, 2026

SUMMARY

The United States District Court for the Western District of Kentucky conducted an initial review of Joel Michael Sibert’s in forma pauperis amended complaint against the City of Murray and unknown police officers. The court dismissed the official-capacity claims against the Doe officers as redundant, but allowed the claims under the ADA, Rehabilitation Act, 42 U.S.C. § 1983, Monell, and the Fourteenth Amendment to proceed against the City.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| COURT                 | United States District Court for the Western District of Kentucky, Paducah Division                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| WRITING FOR THE COURT | Joseph H. McKinley Jr.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| JURISDICTION          | United States District Court for the Western District of Kentucky, Paducah Division                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| DECIDED               | May 6, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| DOCKET                | 5:25-CV-209-JHM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| PROCEDURAL POSTURE    | Initial review of a pro se amended complaint filed in forma pauperis under 28 U.S.C. § 1915(e).                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915(e)(2)(B), the court screened the in forma pauperis complaint and considered whether it was frivolous or malicious, failed to state a claim upon which relief could be granted, or sought monetary relief from an immune defendant. For failure to state a claim, the court applied the Rule 12(b)(6)-type plausibility standard, viewing the complaint favorably to the plaintiff and accepting well-pleaded factual allegations as true, while applying a less stringent standard to the pro se pleading. |
| PRECEDENTIAL VALUE    | unpublished district court memorandum opinion and order; persuasive value only                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

## PARTIES

Joel Michael Sibert v. City of Murray, Kentucky, John Doe Officers 1-5

## TOPICS

civil procedure

ada / disability

section 1983

municipal liability

due process

## PRACTICE AREAS

civil rights

disability discrimination

municipal liability

federal civil procedure

## QUESTIONS PRESENTED

1. Whether the amended complaint stated plausible Title II Americans with Disabilities Act and Section 504 Rehabilitation Act claims against the City based on alleged failure to provide effective communication and auxiliary aids.
2. Whether the amended complaint stated a municipal-liability claim under 42 U.S.C. § 1983 based on an alleged City custom of relying on written notes and failure to train officers regarding ADA compliance.
3. Whether the alleged inclusion of false statements in a police report stated a plausible Fourteenth Amendment due-process claim under § 1983.
4. Whether claims against unknown officers in their official capacities were redundant of claims against the City.

## HOLDINGS

1. Claims against the Murray police officers in their official capacities were equivalent to claims against the City of Murray and were therefore redundant; those claims were dismissed.
2. The amended complaint plausibly stated ADA and Rehabilitation Act claims, and those claims were allowed to continue.
3. The amended complaint plausibly stated a Monell claim against the City based on an alleged custom of relying on written notes instead of providing interpreters or auxiliary aids and an alleged failure to train employees on ADA compliance; the claim was allowed to continue.
4. The amended complaint plausibly stated a Fourteenth Amendment due-process claim based on allegedly false statements attributed to Sibert in the official police report; the claim was allowed to continue.

## KEY QUOTATIONS

*“a suit against an individual in his official capacity is the equivalent of a suit against the governmental entity”* (Section III.A)

*“The ADA and Rehabilitation Act are considered together as the statutes are interpreted similarly.”* (Section III.B)

## FACTUAL BACKGROUND

Sibert, who is deaf and primarily communicates through American Sign Language, was involved in a motor-vehicle collision at an intersection on November 27, 2024. He alleged that Murray police officers knew he was deaf but attempted to communicate with him through handwritten notes rather than an interpreter, relay service, video remote interpreting, or other auxiliary aid. He claimed that the officers misunderstood his statements and included false information in the police report, which his insurer relied on in assessing liability, and that the City maintained customs and training practices that failed to provide effective communication.

**PROCEDURAL HISTORY**

Sibert filed an original complaint and then an amended complaint against the City of Murray and unknown Murray Police Department officers. The court treated the amended complaint as superseding the original, dismissed the official-capacity claims against the Doe officers as redundant of the claims against the City, directed the Clerk to terminate the Murray Police Department as a defendant, and allowed the ADA, Rehabilitation Act, Monell, and due-process claims against the City to continue. The court stated that service and referral to a magistrate judge would be addressed by separate order.

**DISPOSITION**

other

**CASES CITED**

- McGore v. Wrigglesworth, 114 F.3d 601 (6th Cir. 1997)
- Jones v. Bock, 549 U.S. 199 (2007)
- Monell v. New York City Department of Social Services, 436 U.S. 658 (1978)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 556, 570 (2007)
- Tackett v. M & G Polymers, USA, LLC, 561 F.3d 478, 488 (6th Cir. 2009)
- Gunasekera v. Irwin, 551 F.3d 461, 466 (6th Cir. 2009)
- Haines v. Kerner, 404 U.S. 519 (1972)
- Jourdan v. Jabe, 951 F.2d 108, 110 (6th Cir. 1991)
- Hendrock v. Gilbert, 68 F. App'x 573, 574 (6th Cir. 2003)
- Matthews v. Jones, 35 F.3d 1046, 1049 (6th Cir. 1994)
- Lloyd v. City of Streetsboro, No. 18-3485, 2018 WL 11298664, at \*3 (6th Cir. Dec. 20, 2018)
- Babcock v. Michigan, No. 22-CV-12951, 2024 WL 6895830, at \*5 (E.D. Mich. Mar. 30, 2024)
- Tucker v. Tennessee, 539 F.3d 526, 532-33 (6th Cir. 2008)
- Anderson v. City of Blue Ash, 798 F.3d 338 (6th Cir. 2015)
- Lleras-Rodriguez v. Geo Group, Inc., 2022 WL 2951530, at \*5 (W.D. Mich. July 26, 2022)
- Doe v. BlueCross BlueShield of Tennessee, Inc., 926 F.3d 235, 241 (6th Cir. 2019)
- Maddox v. University of Tennessee, 62 F.3d 843, 846 (6th Cir. 1995)
- OutMemphis v. Lee, No. 2:23-CV-2670-SHL-CGC, 2026 WL 881226, at \*12 (W.D. Tenn. Mar. 31, 2026)

- Bullington v. Bedford County, Tennessee, 905 F.3d 467, 475-76 (6th Cir. 2018)
- Ogbonna-McGruder v. Austin Peay State University, No. 3:21-CV-00506, 2023 WL 2416378, at \*8 (M.D. Tenn. Mar. 8, 2023)

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