

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
LOUISIANA

Jerome Chaney v. AmeriNational Community Services, LLC, et al.

Chaney · No. No. 24-901-SDD-SDJ · Decided March 30, 2026

SUMMARY

The United States District Court for the Middle District of Louisiana denied AmeriNational Community Services, LLC’s motion for Rule 11 sanctions against Jerome Chaney. Although Chaney failed to respond to discovery and his claims were ultimately resolved against him on summary judgment, the court found insufficient evidence that the complaint was objectively baseless when filed or that Chaney litigated in bad faith. The court also noted that AmeriNational could have pursued discovery-related relief under Rule 37.

CASE DETAILS

COURT	United States District Court for the Middle District of Louisiana
WRITING FOR THE COURT	Scott D. Johnson
JURISDICTION	United States District Court for the Middle District of Louisiana
DECIDED	March 30, 2026
DOCKET	No. 24-901-SDD-SDJ
DISPOSITION	other
PROCEDURAL POSTURE	Defendant AmeriNational Community Services, LLC moved for sanctions under Federal Rule of Civil Procedure 11, asserting that Plaintiff's complaint was unsupported by fact or law. The motion was unopposed and was decided after the court had previously granted AmeriNat summary judgment.
STANDARD OF REVIEW	Rule 11 sanction decisions are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Unpublished federal district court order; generally nonprecedential.

TOPICS

sanctions credit reporting summary judgment civil procedure

PRACTICE AREAS

Civil procedure Federal Rule of Civil Procedure 11 sanctions Fair Credit Reporting Act

QUESTIONS PRESENTED

1. Whether AmeriNat was entitled to Rule 11 sanctions based on Plaintiff's alleged admission that the claims lacked a factual or legal basis.
2. Whether Plaintiff's failure to participate in discovery and failure to oppose summary judgment established that the complaint was frivolous when filed or that the litigation was conducted in bad faith.

HOLDINGS

1. Rule 11 sanctions were unwarranted because AmeriNat did not establish that Plaintiff's complaint was objectively unreasonable when filed or that Plaintiff litigated in bad faith, vexatiously, or for an improper purpose.
2. A party's failure to respond to discovery, though improper and potentially dispositive, does not alone establish that the lawsuit was frivolous when filed or that the party acted in bad faith in initiating it.

FACTUAL BACKGROUND

Plaintiff alleged that AmeriNat reported obsolete negative information concerning a second mortgage loan to consumer reporting agencies and failed to correct the reporting after a dispute. Plaintiff did not respond to AmeriNat's discovery requests or oppose AmeriNat's summary-judgment motion, resulting in deemed admissions and summary judgment for AmeriNat. AmeriNat then sought Rule 11 sanctions, arguing that the complaint had no factual or legal basis, but the record did not show that the claims were objectively baseless at filing or brought in bad faith.

PROCEDURAL HISTORY

Plaintiff filed an action alleging violations of the Fair Credit Reporting Act based on reporting concerning a second mortgage loan. AmeriNat served discovery, including requests for admission, to which Plaintiff did not respond; the requests were therefore deemed admitted. AmeriNat obtained summary judgment, relying in part on those admissions, and then moved for Rule 11 sanctions. The court denied sanctions because the record did not establish that the complaint was objectively baseless when filed or that Plaintiff litigated in bad faith.

DISPOSITION

other

CASES CITED

- *Heisler v. Kean Miller, LLP*, No. 21-724, 2021 WL 5919507, at *3 (E.D. La. Dec. 15, 2021)
- *Cotter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990)
- *Childs v. State Farm Mutual Automobile Insurance Co.*, 29 F.3d 1019, 1023-24 (5th Cir. 1994)
- *Whitehead v. Food Max of Mississippi, Inc.*, 332 F.3d 796, 802 (5th Cir. 2003)
- *Thomas v. Capital Security Services, Inc.*, 836 F.2d 866, 873 (5th Cir. 1988)
- *Brown v. Clark*, No. CV 18-1069-SDD-RLB, 2022 WL 2445006, at *4-5 (M.D. La. July 5, 2022)

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