

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Sam Bowling and Ryan Owens v. Metropolitan Government of
Nashville and Davidson County, et al.

Bowling · No. 3:26-cv-00282 · Decided May 4, 2026

SUMMARY

The court denies Sam Bowling’s post-judgment motion for leave to file an amended complaint and his request for a hearing. Construing the motion under Federal Rule of Civil Procedure 59(e), the court concludes that none of the grounds for altering the judgment applies and directs the Clerk to return the proposed amended complaint so Bowling may file a new action.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Aleta A. Trauger
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	May 4, 2026
DOCKET	3:26-cv-00282
DISPOSITION	other
PROCEDURAL POSTURE	After the court dismissed the pro se § 1983 action without prejudice for lack of subject-matter jurisdiction and standing, plaintiff Sam Bowling moved under Federal Rule of Civil Procedure 15(a)(2) to file an amended complaint and requested a hearing.
STANDARD OF REVIEW	A post-judgment motion to amend is subject to the heavier burden applicable to reopening a case under Rules 59 or 60, and a Rule 59(e) motion may succeed only on the recognized grounds for altering or amending a judgment.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; precedential status unknown
PARTIES	Sam Bowling, Ryan Owens v. Metropolitan Government of Nashville and Davidson County, et al.

TOPICS

motion to amend

motion for reconsideration

subject matter jurisdiction

standing

section 1983

PRACTICE AREAS

civil procedure

civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether Bowling's post-judgment motion for leave to amend should be treated as a Rule 59(e) motion to alter or amend the judgment.
2. Whether the Rule 59(e) requirements for reopening the dismissed action were satisfied.
3. Whether Bowling was entitled to a hearing on his motion for leave to amend.

HOLDINGS

1. A motion for leave to amend filed after entry of judgment, even when styled under Rule 15(a)(2), is properly treated as a motion to alter or amend the judgment under Rule 59(e) when it seeks to reopen the closed case.
2. Bowling did not establish a clear error of law, newly discovered evidence, an intervening change in controlling law, or a need to prevent manifest injustice warranting alteration or reopening of the judgment.
3. Bowling was not entitled to a hearing before the court ruled on the post-judgment motions.

KEY QUOTATIONS

“Under Rule 59, a court may alter the judgment based on: (1) a clear error of law; (2) newly discovered evidence; (3) an intervening change in controlling law; or (4) a need to prevent manifest injustice.”

“Bowling is of course entitled to assert his claims for damages stemming from the alleged violation of his constitutional rights, but he must do so in a new civil action.”

FACTUAL BACKGROUND

Bowling and Owens purportedly filed a pro se civil-rights action under 42 U.S.C. § 1983, but Owens signed the original and amended complaints while Bowling's signature appeared separately on the original complaint. Bowling was incarcerated when the case was filed and moved to amend after his release. The proposed amended complaint asserted substantially the same factual and legal matters previously related to Bowling, but with Bowling as the proper claimant.

PROCEDURAL HISTORY

The action was initially filed by Sam Bowling and Ryan Owens, but the original complaint was signed by Owens and Bowling's signature appeared on a separate page. The court determined that Bowling was not properly a party and that Owens lacked standing to assert Bowling's constitutional claims, so it dismissed the case without prejudice on April 7, 2026. Bowling later moved to amend after judgment and requested a hearing;

the court construed the post-judgment amendment motion as a Rule 59(e) motion to alter or amend the judgment and denied both motions.

DISPOSITION

other

CASES CITED

- Gen. Motors, LLC v. FCA US, LLC, 44 F.4th 548, 563-64 (6th Cir. 2022)
- Leisure Caviar, LLC v. U.S. Fish & Wildlife Serv., 616 F.3d 612, 616 (6th Cir. 2010)
- Clark v. United States, 764 F.3d 653, 661 (6th Cir. 2014)

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