

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA

William Scott v. Jaison Mikelonis, et al.

Scott · No. 2:25-cv-00031-CB-KT · Decided March 2, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania dismissed William Scott’s case with prejudice as a sanction for fabricating a purported court order and submitting it to the Department of Corrections. The court concluded that dismissal was warranted under its inherent authority after considering the Poulis factors and the integrity of the judicial system.

CASE DETAILS

|                       |                                                                                                                                                                                                                               |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Western District of Pennsylvania                                                                                                                                                         |
| WRITING FOR THE COURT | Cathy Bissoon                                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the Western District of Pennsylvania                                                                                                                                                         |
| DECIDED               | March 2, 2026                                                                                                                                                                                                                 |
| DOCKET                | 2:25-cv-00031-CB-KT                                                                                                                                                                                                           |
| DISPOSITION           | dismissed                                                                                                                                                                                                                     |
| PROCEDURAL POSTURE    | The district court dismissed Plaintiff's civil action with prejudice as an inherent-authority sanction after determining that he fabricated a court order and submitted the purported order to the Department of Corrections. |
| STANDARD OF REVIEW    | The Court rejected Plaintiff's denials under a preponderance-of-the-evidence standard and exercised its inherent authority to impose sanctions. The opinion also considered the Poulis factors governing dismissal sanctions. |
| PRECEDENTIAL VALUE    | unpublished district court memorandum and order; persuasive only                                                                                                                                                              |
| PARTIES               | William Scott v. Jaison Mikelonis, et al.                                                                                                                                                                                     |

TOPICS

- sanctions
- civil procedure

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the Court could dismiss the action with prejudice under its inherent authority as a sanction for fabricating and transmitting a court order.
2. Whether Plaintiff's conduct warranted dismissal after consideration of the Poulis factors and the availability of alternative sanctions.
3. Whether the same result would follow under Federal Rule of Civil Procedure 11.

## HOLDINGS

1. Fabricating a court order and attributing it to the Court is sufficiently egregious misconduct to warrant dismissal with prejudice as an exercise of the Court's inherent authority to sanction.
2. The Poulis factors supported dismissal because Plaintiff bore the greatest possible personal responsibility, his conduct prejudiced the judicial system and court integrity, his conduct was willful, monetary sanctions would be ineffective, and the remaining factors were neutral or immaterial in light of the fraud.
3. The Court concluded that the result would be the same under Federal Rule of Civil Procedure 11, although it imposed dismissal pursuant to its inherent authority.

## KEY QUOTATIONS

*“Although dismissal is a severe sanction, reserved for the worst of offenses, fabricating court orders qualifies.”*

*“To protect the integrity of the legal system, then, the Court’s reaction must be swift and harsh.”*

*“Plaintiff’s case is DISMISSED WITH PREJUDICE.”*

## FACTUAL BACKGROUND

Plaintiff transmitted to the Department of Corrections a purported notice of electronic filing summarizing a nonexistent order that would have temporarily terminated or canceled deductions for his filing fees. He admitted submitting the document but claimed that it had arrived in his legal mail and that he did not know it was fabricated. The Court found that the document reproduced court and docket information accessible primarily to Plaintiff, the lawyers, their staff, and the Court, and that Plaintiff's account was not credible, particularly because correspondence records showed he had not received legal mail during the relevant period.

## PROCEDURAL HISTORY

The Magistrate Judge issued a show-cause order requiring Plaintiff to explain why sanctions should not be imposed after the Court learned that he transmitted a fabricated notice of electronic filing purporting to memorialize a nonexistent order suspending or canceling filing-fee payments. Plaintiff admitted submitting the document but denied knowing it was fake. After considering his response and the City Defendants' evidence, the Court dismissed the case with prejudice.

## DISPOSITION

dismissed

## CASES CITED

- *Stafford v. Derosé*, 2015 WL 1499833, at \*2-5 (M.D. Pa. Apr. 1, 2015)
- *Martin v. Redden*, 34 F.4th 564, 568-69 (7th Cir. 2022)
- *Amfosakyi v. Frito Lay, Inc.*, 496 F. App'x 218, 225 (3d Cir. Sept. 12, 2012)
- *Poulis v. State Farm Fire & Cas. Co.*, 747 F.2d 863 (3d Cir. 1984)

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