

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Siguel v. King Farm Citizens Assembly, Inc., et al.

Civ. No. DLB-25-3145 (D. Md. Jan. 21, 2026) · No. Civ. No. DLB-25-3145 · Decided January 21, 2026

SUMMARY

The United States District Court for the District of Maryland denies Edward Siguel’s motion to vacate and reinstate his 2025 action against King Farm Citizens Assembly, Inc. The court construes the motion as one for reconsideration under Federal Rule of Civil Procedure 59(e) and holds that the 2025 action is duplicative of Siguel’s pending 2022 action because both challenge King Farm’s requirement that he install and maintain a balustrade as an accommodation for his disability. The court states that any newer allegations should be pursued through amendment or supplementation of the 2022 case.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Deborah L. Boardman
JURISDICTION	United States District Court for the District of Maryland
DECIDED	January 21, 2026
DOCKET	Civ. No. DLB-25-3145
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Rules 59(e) and 15(a) to vacate the dismissal without prejudice of his second-filed federal action as duplicative of a pending earlier action and to amend the complaint. The court denied both requests.
STANDARD OF REVIEW	A motion for reconsideration filed within 28 days of an order is evaluated under Federal Rule of Civil Procedure 59(e) and is available only for an intervening change in controlling law, previously unavailable evidence, or correction of a clear error of law or prevention of manifest injustice. A post-judgment motion to amend requires vacatur of the judgment under Rule 59(e) or 60(b), after which amendment is governed by Rule 15(a).
PRECEDENTIAL VALUE	unpublished
PARTIES	Edward Siguel v. King Farm Citizens Assembly, Inc., et al.

TOPICS

motion for reconsideration

motion to amend

civil procedure

ada / disability

real estate

PRACTICE AREAS

civil procedure

Fair Housing Act

disability discrimination

homeowners association disputes

real estate

QUESTIONS PRESENTED

1. Whether the court should reconsider or vacate its dismissal of the 2025 action as duplicative of the pending 2022 action.
2. Whether the later events alleged in the 2025 complaint constituted a distinct controversy that could properly be litigated in a separate action rather than in the pending 2022 case.
3. Whether Siguel should be granted leave to amend the dismissed complaint to add allegations concerning later actions by King Farm and a county agency.

HOLDINGS

1. Reconsideration was unwarranted because Siguel identified neither an intervening change in controlling law nor previously unavailable evidence and did not show a clear error of law or manifest injustice.
2. The 2025 action was properly dismissed as duplicative because its balustrade-related claims arose out of the same wrong and ongoing series of conduct challenged in the 2022 action.
3. Leave to amend was properly denied because the proposed amendment would be futile.

KEY QUOTATIONS

“claims arising out of a single wrong . . . in one action” (at 2)

“Reconsideration is an ‘extraordinary remedy,’ to be used ‘sparingly,’ available on only three grounds: 1) an intervening change in controlling law; 2) previously unavailable evidence; or 3) to correct a clear error of law or prevent manifest injustice.” (at 6)

“But Siguel may not attempt to circumvent adverse rulings in his first-filed suit or to obtain a faster resolution of his claims by filing another suit and claiming the second suit is based on different allegations that could not have been alleged in the first suit.” (at 14)

FACTUAL BACKGROUND

Siguel, who alleged physical disabilities, owned a home in the King Farm community and disputed the homeowners association's requirement that he install and maintain a decorative balustrade on his porch roof. He alleged that the requirement was burdensome, caused physical harm, and violated the Fair Housing Act because King Farm refused his request either to be excused from installing the balustrade or to have King Farm install and maintain it. After filing a 2022 action involving the same continuing dispute, Siguel filed this narrower 2025 action based principally on later demands and denials concerning the balustrade.

PROCEDURAL HISTORY

Siguel filed the 2025 action alleging that King Farm and related defendants violated the Fair Housing Act and other law by requiring him to install and maintain a balustrade on his home. The court sua sponte dismissed the action without prejudice as duplicative of Siguel's pending 2022 action. Siguel moved to vacate the dismissal and sought leave to amend; he also filed an interlocutory appeal, which the Fourth Circuit declined to consider before the district court addressed the motion to vacate.

DISPOSITION

other

CASES CITED

- Colo. River Water Conservation Dist. v. United States, 424 U.S. 800, 817 (1976)
- Sensormatic Sec. Corp. v. Sensormatic Elecs. Corp., 452 F. Supp. 2d 621, 626-27 (D. Md. 2006), *aff'd*, 273 F. App'x 256 (4th Cir. 2008)
- Sensormatic Sec. Corp. v. Sensormatic Elecs. Corp., 273 F. App'x 256, 264-65 (4th Cir. 2008)
- Myers v. Colgate-Palmolive Co., 102 F. Supp. 2d 1208, 1224 (D. Kan. 2000)
- Katyle v. Penn. Nat'l Gaming, Inc., 637 F.3d 462, 470 n.4, 471 (4th Cir. 2011)
- JTH Tax, Inc. v. Aime, 984 F.3d 284, 290 (4th Cir. 2021)
- Pac. Ins. v. Am. Nat'l Fire Ins. Co., 148 F.3d 396, 403 (4th Cir. 1998)
- Hodges v. Meletis, 109 F.4th 252, 263 (4th Cir. 2024)
- Daulatzai v. Maryland, 97 F.4th 166, 177-79 (4th Cir. 2024)
- Laber v. Harvey, 438 F.3d 404, 427-28 (4th Cir. 2006) (en banc)
- Group Home on Gibson Island, LLC v. Gibson Island Corp., No. 23-2295 (4th Cir. July 15, 2025)
- Trustmark Ins. Co. v. ESLU, Inc., 299 F.3d 1265, 1269-70 (11th Cir. 2002)