

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, WESTERN DIVISION

De’Amontae Manning v. Corrections Officer Tristin Pruitt

Case No. 3:25-cv-1867 · No. 3:25-cv-1867 · Decided November 25, 2025

SUMMARY

The United States District Court for the Northern District of Ohio dismissed De’Amontae Manning’s prisoner civil rights action alleging that a corrections officer denied him religious meals during Ramadan. The court denied in forma pauperis status under the Prison Litigation Reform Act’s three-strikes rule, finding no imminent danger of serious physical injury, and required payment of the full filing fee to reopen the case.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Western Division
WRITING FOR THE COURT	Jeffrey J. Helmick
JURISDICTION	United States District Court for the Northern District of Ohio, Western Division
DECIDED	November 25, 2025
DOCKET	3:25-cv-1867
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner filed a prisoner civil-rights complaint seeking damages and moved to proceed in forma pauperis. The district court denied pauper status under the Prison Litigation Reform Act’s three-strikes rule and dismissed the action.
STANDARD OF REVIEW	The court applied the statutory requirements of 28 U.S.C. § 1915(g) to determine whether the imminent-danger exception to the three-strikes rule was satisfied.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	De’Amontae Manning v. Corrections Officer Tristin Pruitt

TOPICS

- prisoners rights
- civil rights
- civil procedure
- damages

PRACTICE AREAS

civil procedure

prisoner civil rights

in forma pauperis proceedings

remedies

QUESTIONS PRESENTED

1. Whether Manning qualified to proceed in forma pauperis despite having at least three prior qualifying dismissals under 28 U.S.C. § 1915(g).
2. Whether Manning's allegations established that he was under imminent danger of serious physical injury when he filed the complaint.
3. Whether the action should be dismissed when the three-strikes rule applied and no imminent-danger exception was shown.

HOLDINGS

1. A prisoner who has brought at least three prior federal actions or appeals dismissed as frivolous, malicious, or for failure to state a claim may not proceed in forma pauperis unless the imminent-danger exception applies. Manning had at least three qualifying prior dismissals, so he was barred from proceeding in forma pauperis.
2. The imminent-danger exception requires facts supporting a reasonable inference that the prisoner faced a real and proximate danger of serious physical injury when the complaint was filed; allegations of past harm do not satisfy that requirement.
3. Because Manning was barred from proceeding in forma pauperis and did not qualify for the imminent-danger exception, the action was dismissed under 28 U.S.C. § 1915(g).

KEY QUOTATIONS

"To qualify for the exception to the three-strikes rule, a plaintiff must plead sufficient 'facts from which a court, informed by its judicial experience and common sense, could draw a reasonable inference' that the plaintiff was under a real and proximate danger of serious physical injury at the time he filed his complaint."

FACTUAL BACKGROUND

Manning, a state prisoner incarcerated at the Toledo Correctional Institution, alleged that he was denied appropriate religious meals during Ramadan on March 15, 2025. He filed this action in September 2025 and sought damages, proceeding without prepayment of fees and costs. The court found that he had at least three prior federal actions or appeals dismissed as frivolous, malicious, or for failure to state a claim, and that his complaint did not allege a real and proximate danger of serious physical injury at filing.

PROCEDURAL HISTORY

Manning filed a complaint alleging that Corrections Officer Tristin Pruitt denied him appropriate religious meals during Ramadan on March 15, 2025. He also moved to proceed without prepayment of fees and costs. The court found that Manning had at least three qualifying prior dismissals and had not shown that he faced imminent danger of serious physical injury when he filed this action in September 2025. The court denied the motion to

proceed in forma pauperis and dismissed the case, while permitting reopening if Manning paid the full filing fee and timely moved to reopen.

DISPOSITION

dismissed

CASES CITED

- Rittner v. Kinder, 290 F. App'x 796, 797-98 (6th Cir. 2008)
- Vandiver v. Prison Health Servs., Inc., 727 F.3d 580, 585 (6th Cir. 2013)
- Manning v. Henderson, No. 4:24-cv-795 (N.D. Ohio dismissed July 19, 2024)
- Manning v. Henderson, No. 3:24-cv-559 (N.D. Ohio dismissed Sept. 26, 2025)
- Manning v. Ellis, No. 3:24-cv-1170 (N.D. Ohio dismissed Sept. 18, 2024)

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