

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Tyrone William Mahan v. Advance Correctional Healthcare, et al.

Mahan · No. 25-cv-12453 · Decided January 12, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan denied without prejudice Tyrone William Mahan’s motion for leave to amend his civil rights complaint. The court held that Mahan failed to attach a proposed amended complaint as required by Eastern District of Michigan Local Rule 15.1 and instructed him to submit a complete proposed complaint if he seeks to amend.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Elizabeth A. Stafford
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	January 12, 2026
DOCKET	25-cv-12453
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a prisoner proceeding pro se, moved for leave to amend his 42 U.S.C. § 1983 complaint to add defendants. The magistrate judge denied the motion without prejudice because plaintiff failed to attach a proposed amended complaint as required by Eastern District of Michigan Local Rule 15.1.
STANDARD OF REVIEW	Objections to the magistrate judge's ruling on this non-dispositive motion may be sustained only if the ruling is clearly erroneous or contrary to law under Federal Rule of Civil Procedure 72(a) and 28 U.S.C. § 636.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district court order.
PARTIES	Tyrone William Mahan v. Advance Correctional Healthcare, et al.

TOPICS

motion to amend

pleadings

civil procedure

section 1983

civil rights

PRACTICE AREAS

civil procedure

civil rights

constitutional law

prisoner civil rights

QUESTIONS PRESENTED

1. Whether plaintiff's motion for leave to amend should be granted when he failed to attach a proposed amended complaint as required by E.D. Mich. LR 15.1.
2. Whether the motion should be denied without prejudice to refiling with a complete proposed amended complaint.

HOLDINGS

1. A party seeking to amend a pleading in the Eastern District of Michigan must attach a proposed amended pleading that reproduces the entire pleading as amended and may not incorporate the prior pleading by reference.
2. Failure to comply with E.D. Mich. LR 15.1 permits denial of a motion to amend without prejudice.

KEY QUOTATIONS

“This proposed complaint will supersede and nullify all of [his] original complaint if accepted.”

FACTUAL BACKGROUND

Tyrone William Mahan, a prisoner proceeding pro se, brought a § 1983 action against twelve defendants for alleged constitutional and statutory violations arising from his confinement at the Genesee County Jail. He sought leave to amend his complaint to add new defendants but did not attach a proposed amended complaint.

PROCEDURAL HISTORY

Mahan filed a § 1983 action against twelve defendants concerning alleged constitutional and statutory violations arising from his confinement at the Genesee County Jail. The district judge referred the case to Magistrate Judge Elizabeth A. Stafford for all pretrial matters under 28 U.S.C. § 636(b)(1). Mahan then moved under Federal Rule of Civil Procedure 15(c) for leave to amend, and the court denied the motion without prejudice.

DISPOSITION

other

CASES CITED

- Rosas v. Mich. Dept. of Health & Human Servs., No. 1:24-cv-11400, 2024 WL 3448449, at *2 (E.D. Mich. July 16, 2024)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION TYRONE WILLIAM MAHAN, Case No. 25-cv-12453 Plaintiff, Honorable Terrence G. Berg Magistrate Judge Elizabeth A. Stafford v. ADVANCE CORRECTIONAL HEALTHCARE, et al., Defendants. ORDER DENYING WITHOUT PREJUDICE PLAINTIFF'S MOTION FOR LEAVE TO AMEND (ECF NO. 8) Plaintiff Tyrone William Mahan, a prisoner proceeding pro se, brings this action under 42 U.S.C. § 1983 against twelve defendants for alleged constitutional and statutory violations arising from his confinement at the Genesee County Jail.

ECF No. 1. The Honorable Terrence G. Berg referred the case to the undersigned for all pretrial matters under 28 U.S.C. § 636(b)(1). ECF No. 7. Mahan moves to amend his complaint under Federal Rule of Civil Procedure 15(c) to add new defendants. ECF No. 8.

Under the Court's local rules, A party who moves to amend a pleading shall attach the proposed amended pleading to the motion. Any amendment to a pleading, whether filed as a matter of course or upon a motion to amend, must...reproduce the entire pleading as amended, and may not incorporate any prior pleading by reference. E.D. Mich. LR 15.1. Mahan did not attach a proposed amended complaint to his motion.

Although failure to comply with Local Rule 15.1 "is not grounds for denial of the motion," denial without prejudice is permitted. See *Rosas v. Mich. Dept. of Health & Human Servs.*, No. 1:24-cv-11400, 2024 WL 3448449, at *2 (E.D. Mich. July 16, 2024). If Mahan files an amended complaint or seeks leave to do so, he must submit "a proposed complaint that contains all of his allegations, realleging any facts from his original complaint he does not wish to amend.

This proposed complaint will supersede and nullify all of [his] original complaint if accepted." Id. Thus, Mahan's motion is DENIED WITHOUT PREJUDICE. s/Elizabeth A. Stafford ELIZABETH A. STAFFORD United States Magistrate Judge Dated: January 12, 2026 NOTICE TO PARTIES ABOUT OBJECTIONS Within 14 days of being served with this order, any party may file objections with the assigned district judge.

Fed. R. Civ. P. 72(a). The district judge may sustain an objection only if the order is clearly erroneous or contrary to law. 28 U.S.C. § 636. "When an objection is filed to a magistrate judge's ruling on a non-dispositive motion, the ruling remains in full force and effect unless and until it is stayed by the magistrate judge or a district judge." E.D. Mich. LR 72.2.

CERTIFICATE OF SERVICE The undersigned certifies that this document was served on counsel of record and any unrepresented parties via the Court's ECF System to their email or First Class U.S. mail addresses disclosed on the Notice of Electronic Filing on January 12, 2026. s/Davon Allen DAVON ALLEN Case Manager

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