

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Clinton James Pearson, Jr. v. Ellen Brooks, et al.

Pearson · No. 2:25-CV-1014-WKW · Decided January 28, 2026

SUMMARY

The court dismissed a state inmate’s 42 U.S.C. § 1983 complaint challenging the fact or duration of his incarceration. The court held that the claims were improperly brought as a civil rights action and were frivolous under 28 U.S.C. § 1915A(b)(1), because the exclusive federal remedy was a habeas petition under 28 U.S.C. § 2254. The action was dismissed with prejudice after the plaintiff failed to respond to an order concerning recharacterization of the complaint.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	W. Keith Watkins
JURISDICTION	United States District Court for the Middle District of Alabama
DECIDED	January 28, 2026
DOCKET	2:25-CV-1014-WKW
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner filed a pro se action under 42 U.S.C. § 1983 seeking dismissal of charges and release from confinement. The district court dismissed the action with prejudice during screening and for failure to prosecute after the plaintiff failed to respond to an order concerning recharacterization of the action as a habeas petition.
STANDARD OF REVIEW	The court applied the statutory screening standard under 28 U.S.C. § 1915A and considered whether dismissal was warranted for failure to prosecute and failure to comply with a court order.
PRECEDENTIAL VALUE	unpublished
PARTIES	Clinton James Pearson, Jr. v. Ellen Brooks, et al.

TOPICS

- section 1983
- federal habeas corpus
- prisoners rights
- civil procedure
- post-conviction relief

PRACTICE AREAS

civil procedure

prisoner civil rights

federal habeas corpus

post-conviction relief

remedies

QUESTIONS PRESENTED

1. Whether the action should be dismissed for failure to prosecute and failure to comply with the court's order.
2. Whether a prisoner's claims challenging the fact or duration of confinement may proceed under 42 U.S.C. § 1983 or must instead be brought in a petition for habeas corpus under 28 U.S.C. § 2254.
3. Whether the claims were frivolous and subject to dismissal under 28 U.S.C. § 1915A(b)(1).

HOLDINGS

1. A district court may dismiss an action when a plaintiff fails to prosecute or comply with a court order, and Pearson's failure to respond to the December 30 Order warranted dismissal.
2. A state prisoner's claim challenging the fact or duration of incarceration and seeking immediate or speedier release must be brought through a petition for habeas corpus under 28 U.S.C. § 2254, not a civil-rights action under § 1983.
3. Pearson's § 1983 claims were frivolous under 28 U.S.C. § 1915A(b)(1) because they challenged the fact or duration of his incarceration and therefore were brought under the wrong federal cause of action.

KEY QUOTATIONS

"The proper way for a state inmate to challenge the fact or duration of his sentence is through a petition for writ of habeas corpus under 28 U.S.C. § 2254."

"These claims can only be brought in a petition for writ of habeas corpus under § 2254."

FACTUAL BACKGROUND

Clinton James Pearson, Jr., an Alabama state inmate, filed a threadbare pro se complaint under 42 U.S.C. § 1983. He alleged kidnapping, conspiracy to defraud, attempted murder, and that he had served more time than he should have, and he sought dismissal of the charges and immediate release. The court determined that his allegations challenged the fact or duration of his incarceration rather than the conditions of confinement. Pearson failed to respond to the court's order directing him to choose between proceeding under § 2254, amending his claims, or withdrawing the action.

PROCEDURAL HISTORY

Pearson filed a § 1983 complaint alleging kidnapping, conspiracy to defraud, attempted murder, and that he had served more time than he should have. The court ordered him to state whether he wished to proceed under 28 U.S.C. § 2254, amend the petition, or withdraw it. Pearson failed to respond by the deadline, and the court dismissed the § 1983 claims with prejudice as frivolous under 28 U.S.C. § 1915A(b)(1), also relying on his failure to prosecute and comply with the court's order.

DISPOSITION

dismissed

CASES CITED

- *McNair v. Johnson*, 143 F.4th 1301, 1306–07 (11th Cir. 2025)
- *Link v. Wabash R.R. Co.*, 370 U.S. 626, 629–30 (1962)
- *Moon v. Newsome*, 863 F.2d 835, 837 (11th Cir. 1989)
- *Bilal v. Driver*, 251 F.3d 1346, 1349 (11th Cir. 2001)
- *Preiser v. Rodriguez*, 411 U.S. 475, 498–500 (1973)
- *Pickett v. Wise*, 849 F. App'x 904, 905 (11th Cir. 2021) (per curiam)
- *Cook v. Baker*, 139 F. App'x 167, 168–69 (11th Cir. 2005) (per curiam)