

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, NORTHERN DIVISION

Jay Jones v. Blake R. Gill, Hoe/Garden Squad, ADC

Jones · No. 3:26-CV-00050-DPM-BBM · Decided February 10, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas stayed and administratively terminated Jay Jones’s civil rights action against Blake R. Gill. The court found that the allegations substantially duplicated those in Jones v. Gill, 3:25-CV-00143-DPM, and directed Jones to move to reopen within 30 days after final judgment in that case or face dismissal without prejudice for failure to prosecute.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
JURISDICTION	United States District Court for the Eastern District of Arkansas
DECIDED	February 10, 2026
DOCKET	3:26-CV-00050-DPM-BBM
DISPOSITION	other
PROCEDURAL POSTURE	A prisoner filed a 42 U.S.C. § 1983 complaint alleging unconstitutional conditions of prison work. The district court determined that the action substantially duplicated an earlier pending action involving the same parties and controversy and stayed and administratively terminated the later action.
STANDARD OF REVIEW	Abuse-of-discretion framework governing a district court's control of its docket and decision to stay duplicative proceedings.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Jay Jones v. Blake R. Gill, Hoe/Garden Squad, ADC

TOPICS

- civil procedure
- section 1983
- prisoners rights
- government liability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should stay and administratively terminate a later-filed federal action whose allegations substantially duplicate those in an earlier pending action involving the same parties and controversy.
2. Whether the court may require the plaintiff to move to reopen the stayed action after final judgment in the earlier action and warn that failure to do so will result in dismissal without prejudice for failure to prosecute.

HOLDINGS

1. When two federal suits involving the same parties and controversy are pending simultaneously, the district court may decline to exercise jurisdiction over the duplicative action and dismiss one of them.
2. The district court has broad discretion to stay proceedings as an incident of its authority to control its docket and may stay a duplicative action pending resolution of the earlier action.

KEY QUOTATIONS

“Plaintiffs may not pursue multiple federal suits against the same party involving the same controversy at the same time.” (Order)

“The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket.” (Order)

FACTUAL BACKGROUND

Jones, an Arkansas prisoner, alleged that on June 30, 2025, Blake R. Gill made him work on a hoe squad in hot sun while Jones had two broken fingers. The court found these allegations substantially identical to allegations in Jones's earlier pending action against Gill. The earlier action included a pending recommendation for dismissal without prejudice based on failure to exhaust administrative remedies.

PROCEDURAL HISTORY

Jones filed this § 1983 action on February 9, 2026. The court found the allegations substantially identical to those in *Jones v. Gill*, No. 3:25-CV-00143-DPM, which remained pending. Although a magistrate judge in the earlier case had recommended dismissal without prejudice for failure to exhaust administrative remedies, that recommendation had not yet been resolved. The court stayed and administratively terminated this case, allowing Jones 30 days after final judgment in the earlier case to move to reopen.

DISPOSITION

other

CASES CITED

- Jones v. Gill, No. 3:25-CV-00143-DPM
- Missouri ex rel. Nixon v. Prudential Health Care Plan, Inc., 259 F.3d 949, 954-55 (8th Cir. 2001)
- Clinton v. Jones, 520 U.S. 681, 706 (1997)

OPINION

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION JAY JONES PLAINTIFF ADC #157758 V. Case No. 3:26-CV-00050-DPM-BBM BLAKE R. GILL, Hoe/Garden Squad, ADC DEFENDANT ORDER On February 9, 2026, Plaintiff Jay Jones (“Jones”), a prisoner in the Grimes Unit of the Arkansas Division of Correction, filed a Complaint pursuant to 42 U.S.C. § 1983.

(Doc. 2). Jones alleges that, on June 30, 2025, Defendant Blake R. Gill made him work on the hoe squad, in the hot sun, with two broken fingers. (Doc. 2 at 5). These allegations are substantially identical to those currently pending in Jones v. Gill, 3:25-CV-00143-DPM (“Jones I”).¹ “Plaintiffs may not pursue multiple federal suits against the same party involving the same controversy at the same time.” Missouri ex rel.

Nixon v. Prudential Health Care Plan, Inc., 259 F.3d 949, 954 (8th Cir. 2001). When facing duplicative litigation, the district court may decline to exercise jurisdiction and dismiss one of the two identical pending actions. Id. at 954–55.

The Court stops short doing so here and, instead, stays this case pending the resolution of Jones I. See Clinton v. Jones, 520 U.S. 681, 706 (1997) 1 Although the magistrate judge in Jones I has recommended that the case be dismissed without prejudice for failure to exhaust administrative remedies, Jones I, (Doc. 23), that recommendation remains pending before the district judge. (citation omitted) (“The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket.”).

IT IS THEREFORE ORDERED THAT: 1. This case is hereby STAYED and administratively TERMINATED. 2. If Jones wishes to pursue this lawsuit, then he must file a motion to reopen no later than 30 days after a final judgment has been entered in Jones v. Gill, 3:25-CV- 00143-DPM (“Jones I”). If he fails to do so, the Court will reopen the case and dismiss it without prejudice for failure to prosecute.

SO ORDERED this 10th day of February, 2026. yun a Wardve- TED STATES MAGISTRATE JUDGE