

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA, ROANOKE DIVISION

Jullian A. Huffman v. Crystal Large, et al.

Huffman · No. 7:25CV00916 · Decided March 2, 2026

SUMMARY

The United States District Court for the Western District of Virginia dismissed without prejudice Jullian A. Huffman’s § 1983 action alleging inadequate treatment for gender dysphoria. The court denied in forma pauperis status under the Prison Litigation Reform Act’s three-strikes provision, finding that Huffman had not shown an imminent danger of serious physical injury. The court concluded that alleged future suicide risk did not satisfy the imminent-danger exception.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	James P. Jones
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	March 2, 2026
DOCKET	7:25CV00916
DISPOSITION	dismissed
PROCEDURAL POSTURE	A Virginia inmate filed a civil rights action under 42 U.S.C. § 1983 and sought to proceed in forma pauperis without prepaying filing fees. The district court screened the allegations under the Prison Litigation Reform Act's three-strikes provision.
STANDARD OF REVIEW	The court applied the statutory screening and eligibility requirements of 28 U.S.C. § 1915(g), construing the imminent-danger exception narrowly.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Jullian A. Huffman v. Crystal Large, et al.

TOPICS

- prisoners rights
- section 1983
- civil rights
- civil procedure
- injunctions

PRACTICE AREAS

prisoner civil rights

in forma pauperis procedure

Prison Litigation Reform Act

gender dysphoria medical care

QUESTIONS PRESENTED

1. Whether Huffman qualified to proceed in forma pauperis under the imminent-danger exception to 28 U.S.C. § 1915(g) despite his prior qualifying dismissals.
2. Whether allegations of untreated gender dysphoria and a risk of future self-harm established imminent danger of serious physical injury under § 1915(g).
3. Whether the complaint should be dismissed without prejudice when Huffman had not prepaid the filing and administrative fees and did not qualify for installment payments.

HOLDINGS

1. A prisoner subject to the three-strikes rule may proceed in forma pauperis only by alleging facts showing a real and proximate imminent danger of serious physical injury at the time the complaint is filed.
2. Huffman's allegations that defendants failed to treat his gender dysphoria and that he was at risk of future suicide did not establish imminent danger of serious physical injury under § 1915(g).
3. Because Huffman did not qualify for the imminent-danger exception and had not prepaid the required filing and administrative fees, the court denied in forma pauperis status and dismissed the complaint without prejudice.

KEY QUOTATIONS

“The “imminent danger” exception to § 1915(g)’s “three strikes” rule must be construed narrowly and applied only “for genuine emergencies,” where “a threat . . . is real and proximate” to the alleged official misconduct.”

“An inmate cannot create the imminent danger. In other words, he may not use an allegation of future self-harm as an imminent danger to bypass § 1915(g).”

FACTUAL BACKGROUND

Huffman, a Virginia inmate, alleged that Crystal Large, Dr. Mandi Hixenbaugh, and Dr. Amit Shah failed to treat his gender dysphoria. He asserted that leaving the condition untreated had caused a past suicide attempt and placed him at risk of suicide in the future. He sought estrogen, female undergarments, and gender-affirming surgery, but did not allege facts showing that the lack of treatment created a real and proximate threat of serious physical injury.

PROCEDURAL HISTORY

Huffman filed a complaint alleging failure to treat gender dysphoria and requested injunctive relief. He did not prepay the filing and administrative fees but submitted a prisoner trust account report and statement of assets, which the court construed as an implied application to proceed in forma pauperis. The court denied in forma

pauperis status under 28 U.S.C. § 1915(g) and dismissed the complaint without prejudice because Huffman did not establish imminent danger of serious physical injury.

DISPOSITION

dismissed

CASES CITED

- Huffman v. McAfee, No. 7:24CV00640 (W.D. Va. Nov. 18, 2024)
- Huffman v. Fuller, No. 7:24CV00438 (W.D. Va. Oct. 30, 2024)
- Huffman v. Poole, No. 7:24CV00384 (W.D. Va. Oct. 24, 2024)
- Lewis v. Sullivan, 279 F.3d 526, 531 (7th Cir. 2002)
- Chase v. O'Malley, 466 F. App'x 185, 186 (4th Cir. 2012)
- Martin v. Shelton, 319 F.3d 1048, 1050 (8th Cir. 2003)
- Sunshine v. Searls, No. 5:21-CV-164, 2021 WL 4304696, at *2 (N.D. W. Va. Sept. 21, 2021)
- Valenzuela v. Corizon Headquarters, No. 3:19-cv-00104, 2019 WL 13521565, at *2 (M.D. Tenn. Feb. 8, 2019)
- Johnson v. Ala. Dep't of Corr., No. 2:07-CV-0767-WKW, 2008 WL 276577, at *1 (M.D. Ala. Jan. 29, 2008)
- Ashcroft v. Iqbal, 556 U.S. 662, 670 (2009)
- Springer v. Anderson, No. 7:22CV00663, 2022 WL 17292160, at *2 (W.D. Va. Nov. 29, 2022)
- Huffman v. Large, No. 7:24CV00493, 2025 WL 18623, at 2 (W.D. Va. Jan. 2, 2025)

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