

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, FORT MYERS DIVISION

**Andrew Bryant Sheets v. Matthew Woelk, in Personal Capacity; City
of Punta Gorda; and Cody Waldrop, in Personal Capacity**

Sheets · No. 2:25-cv-61-KCD-DNF · Decided February 2, 2026

SUMMARY

The United States District Court for the Middle District of Florida denied Andrew Bryant Sheets’s motion for judicial notice of an adjudicative fact from a separate case involving the City of Punta Gorda. The Court held that Federal Rule of Evidence 201 permits notice of the existence and contents of another court’s order, but not treating its factual findings or legal conclusions as indisputably true in a separate action.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Fort Myers Division
JURISDICTION	United States District Court for the Middle District of Florida, Fort Myers Division
DECIDED	February 2, 2026
DOCKET	2:25-cv-61-KCD-DNF
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Evidence 201 for judicial notice of a legal ruling from a separate action involving the City of Punta Gorda. The district court denied the motion.
STANDARD OF REVIEW	The court applied the requirements of Federal Rule of Evidence 201 governing judicial notice of adjudicative facts.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown
PARTIES	Andrew Bryant Sheets v. Matthew Woelk, in Personal Capacity, City of Punta Gorda, Cody Waldrop, in Personal Capacity

TOPICS

judicial notice

evidence

summary judgment

due process

civil procedure

PRACTICE AREAS

evidence

civil procedure

constitutional law

civil rights

QUESTIONS PRESENTED

1. Whether the court could take judicial notice under Federal Rule of Evidence 201 that a legal conclusion reached in a prior summary-judgment proceeding was an adjudicative fact binding in the present action.
2. Whether the court could judicially notice the factual findings or legal conclusions in an order from another proceeding as indisputably true, rather than merely notice the existence of the order and related filings.

HOLDINGS

1. A prior court's legal conclusion is not an adjudicative fact subject to judicial notice merely because it appears in a judicial order. Rule 201 does not permit a party to carry a legal conclusion from one lawsuit into another to avoid the party's evidentiary burden.
2. The court may take judicial notice that the prior order was issued and what the order said, but may not take judicial notice of the order's factual findings or legal conclusions as indisputably true for purposes of a separate case involving different parties and a different record.

KEY QUOTATIONS

“It is not, however, a mechanism for cutting and pasting legal conclusions from one lawsuit to another to bypass the evidentiary burden.”

“A court may take judicial notice of a document filed in another court “not for the truth of the matters asserted in the other litigation, but rather to establish the fact of such litigation and related filings.””

“But we cannot take judicial notice of the factual findings or legal conclusions contained in that order as being indisputably true for the purposes of a separate case involving different parties and a different record.”

FACTUAL BACKGROUND

In a prior case, the court granted or addressed summary judgment after concluding that the City had failed to produce evidence of a valid procedural avenue for appealing Sheets's trespass warning. In this action, Sheets sought to have that prior ruling treated as an adjudicative fact binding on the defendants. The court concluded that the prior ruling arose from a specific evidentiary record and could not establish the truth of factual findings or legal conclusions in this separate litigation.

PROCEDURAL HISTORY

Sheets sought judicial notice of a ruling in *Sheets v. City of Punta Gorda*, Case No. 2:24-cv-495-KCD-DNF, asserting that the prior ruling established as an adjudicative fact that the City's trespass-warning procedure violated the Fourteenth Amendment. The court explained that the prior ruling was made on summary judgment and did not establish facts or legal conclusions for purposes of this separate action involving a different record and parties.

DISPOSITION

other

CASES CITED

- United States v. Jones, 29 F.3d 1549, 1553 (11th Cir. 1994)
- Awodiya v. Ross Univ. Sch. of Med., No. 18-CV-60482-KMM, 2018 WL 11472292, at *2 (S.D. Fla. June 22, 2018)
- Grayson v. Warden, Comm’r, Ala. DOC, 869 F.3d 1204, 1225 (11th Cir. 2017)
- Moon v. Newsome, 863 F.2d 835, 837 (11th Cir. 1989)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION ANDREW BRYANT SHEETS, Plaintiff, Case No. 2:25-cv-61-KCD-DNF v. MATTHEW WOELK, IN PERSONAL CAPACITY; CITY OF PUNTA GORDA; AND CODY WALDROP, IN PERSONAL CAPACITY, Defendants. / ORDER Before the Court is Plaintiff Andrew Bryant Sheets’s Motion for Judicial Notice of Adjudicative Fact.

(Doc. 100.)¹ He asks this Court to take judicial notice of a ruling issued in a separate proceeding, Sheets v. City of Punta Gorda, Case No. 2:24-cv-495-KCD-DNF. Specifically, he seeks to classify a legal ruling reached in that prior case—that the City’s proffered trespass- warning procedure violated the Fourteenth Amendment—as an “adjudicative fact” binding in this current litigation.

(Doc. 100 at 1.) The motion is DENIED. Federal Rule of Evidence 201 allows courts to recognize facts that are beyond reasonable controversy. It is not, however, a 1 Unless otherwise indicated, all internal quotation marks, citations, case history, and alterations have been omitted in this and later citations. mechanism for cutting and pasting legal conclusions from one lawsuit to another to bypass the evidentiary burden.

See United States v. Jones, 29 F.3d 1549, 1553 (11th Cir. 1994). To start, Sheets’s request misinterprets the procedural posture of the prior case. The ruling in Case No. 24-cv-495 was a summary judgment determination.

In that context, the Court held that the City had failed to meet its burden to produce evidence of a valid procedural avenue for appealing Sheets’s trespass warning. (See Doc. 100-1 at 2.) A ruling on summary judgment is a determination that a party has failed to establish a genuine dispute of material fact based on the evidence then before the court. It is not a universal declaration that no such evidence exists in the world, nor does it establish that fact for all future litigants.

It simply means that, in that specific instance, the City did not prove its defense as a matter of law. To transform a failure of proof in one docket into an “adjudicative fact” in another would

improperly relieve Sheets of his burden of proof here and deny Defendants in this case the opportunity to present their own evidence. Not surprisingly, this approach finds no support in the law.

See, e.g., *Awodiya v. Ross Univ. Sch. of Med.*, No. 18-CV-60482-KMM, 2018 WL 11472292, at *2 (S.D. Fla. June 22, 2018) (“[J]udicial notice is generally not the appropriate means to establish legal principles governing the case[.]”). That fundamental problem aside, Sheets still loses. Federal Rule of Evidence 201(b) permits judicial notice of an adjudicative fact only if it “is not subject to reasonable dispute” because it either: (1) is generally known within the trial court’s territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.

Id. According to Sheets, because this Court previously found the City’s trespass policy constitutionally deficient in Case No. 24-cv-495, that finding is now an indisputable fact. This misunderstands the distinction between the existence of a judicial record and the truth of the matters asserted within it. A court may take judicial notice of a document filed in another court “not for the truth of the matters asserted in the other litigation, but rather to establish the fact of such litigation and related filings.” *Jones*, 29 F.3d at 1553.

In other words, this Court can take notice that an order was issued in Case No. 24-cv-495. And we can take notice of what that order said. But we cannot take judicial notice of the factual findings or legal conclusions contained in that order as being indisputably true for the purposes of a separate case involving different parties and a different record. *Id.* (explaining that a court cannot take judicial notice of factual findings from another proceeding because those findings are not “indisputable” in the context of the new case).

The finding Sheets points to—that a potential due process violation occurred—is a legal conclusion derived from a specific set of evidence presented in that specific case. It is not a fact in the sense of the day of the week or the laws of physics.

As the Eleventh Circuit has noted, factual findings in a court order do not satisfy the indisputability requirement of Rule 201 because they are the product of the adversarial process in a specific context. See *Grayson v. Warden*, Comm’, Ala. Doc, 869 F.3d 1204, 1225 (11th Cir. 2017).

To close, the Court offers this word of warning. To be sure, Sheets is entitled to significant leeway because he is proceeding without counsel. But that leniency has limits. It is not a license to clutter the docket with baseless arguments or to bypass the basic requirements of the Federal Rules. Even a pro se litigant has a duty to research the law and ensure his contentions have a nonfrivolous basis before firing off a filing.

See *Moon v. Newsome*, 863 F.2d 835, 837 (11th Cir. 1989) (noting that pro se litigants remain “subject to the relevant law and rules of court, including the Federal Rules of Civil Procedure”).

Moving forward, Sheets is reminded that the right to access the courts carries with it the obligation to respect judicial resources and to refrain from filing motions that lack reasonable legal support.

ORDERED in Fort Myers, Florida on February 2, 2026. United States District Judge

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