

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

Steven Harris v. Washington County, Purgatory Correctional Facility, Washington County Sheriff's Office, Kyle Bigelow, Garret McKean, Sgt. Lacie Crowther, Dep. Kevin M. Larson, Dep. Brice Lubitz, Dep. John Jacobs, Dep. Lacey Adams, Dep. Andrew Miller, Dep. Tyler Tait, Dep. Jay B. Chadwick, Dep. Courtney Cheeman, Dep. Bailee W. Mabe, Dep. Kaitlyn Johnson, Warden, and Officer J. Dickerson

Case No. 4:25-cv-00018-AMA-PK · No. 4:25-cv-00018-AMA-PK · Decided March 24, 2026

SUMMARY

The United States District Court for the District of Utah denied Steven Harris’s motion for sanctions concerning Washington County Defendants’ responses to requests for admission about Utah’s DNA-collection statute and the classification of an offense. The court held that one request sought a pure legal conclusion and that the other was properly denied because the charges had not yet been filed when Harris’s DNA was collected. The court also denied the Defendants’ requests for attorney fees and sanctions because the cited procedural provisions and Rule 11 requirements were not satisfied.

CASE DETAILS

COURT	United States District Court for the District of Utah
WRITING FOR THE COURT	Paul Kohler
JURISDICTION	United States District Court for the District of Utah
DECIDED	March 24, 2026
DOCKET	4:25-cv-00018-AMA-PK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for sanctions under Federal Rule of Civil Procedure 37(c)(2), challenging Defendants' responses to requests for admission. Defendants opposed the motion and sought attorney fees and sanctions.
PRECEDENTIAL VALUE	unpublished district court memorandum decision; precedential status not stated

PARTIES

Steven Harris v. Washington County, Purgatory Correctional Facility, Washington County Sheriff's Office, Kyle Bigelow, Garret McKean, Sgt. Lacie Crowther, Dep. Kevin M. Larson, Dep. Brice Lubitz, Dep. John Jacobs, Dep. Lacey Adams, Dep. Andrew Miller, Dep. Tyler Tait, Dep. Jay B. Chadwick, Dep. Cortney Cheeman, Dep. Bailee W. Mabe, Dep. Kaitlyn Johnson, Warden, Officer J. Dickerson

TOPICS

sanctions

discovery dispute

civil procedure

statutory interpretation

PRACTICE AREAS

civil procedure

discovery and sanctions

QUESTIONS PRESENTED

1. Whether Defendants' objection and denial to Plaintiff's requests for admission warranted sanctions under Federal Rule of Civil Procedure 37(c)(2).
2. Whether Defendants' request for attorney fees or sanctions under Federal Rule of Civil Procedure 37 or Rule 11 could be granted.

HOLDINGS

1. Federal Rule of Civil Procedure 36 does not require a party to admit or deny a pure matter of law, and a responding party may object when a request calls for a legal conclusion.
2. Sanctions were unwarranted because Defendants were not required to respond to the purely legal first request, and the denial of the second request was accurate on the facts presented.
3. Defendants were not entitled to attorney fees or sanctions because Rule 37(c)(3) does not exist, an award under Rule 37(a)(5)(B) would be unjust, and Defendants failed to comply with Rule 11's procedural requirements.

KEY QUOTATIONS

"Rule 36 does not permit a request for admission of a pure matter of law."

"Compliance with Rule 11 is mandatory and Defendants' failure to comply necessitates denial."

"It is therefore ORDERED that Plaintiff's Motion for Sanctions (Docket No. 114) is DENIED."

FACTUAL BACKGROUND

Defendants responded to Plaintiff's requests for admission concerning whether Utah Code section 76-10-2402(1) (a) was a misdemeanor and whether Washington County Sheriff's Office personnel collected Plaintiff's DNA while he was charged only with a misdemeanor. The court found that the first request sought a purely legal conclusion and that the second request was factually accurate because Plaintiff had not yet been charged when

the DNA sample was taken. The court also noted that the classification of the offense as a misdemeanor or felony remained disputed, with evidence supporting both characterizations.

PROCEDURAL HISTORY

Plaintiff served requests for admission concerning the classification of a Utah offense and the circumstances of DNA collection. Defendants objected to the first request and denied both requests. The magistrate judge denied Plaintiff's motion for sanctions on the merits and denied Defendants' requests for attorney fees and sanctions.

DISPOSITION

other

CASES CITED

- Hilgenberg v. Elggren & Peterson, No. 2:13-CV-1086, 2015 WL 4077765, at *2 (D. Utah July 6, 2015)
- Roth v. Green, 466 F.3d 1179, 1191-92 (10th Cir. 2006)