

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, ALBANY DIVISION

Robert Lee Harling v. Dougherty County Jail, et al.

Harling · No. 1:25-cv-140-LAG-ALS · Decided December 9, 2025

SUMMARY

The court orders pro se prisoner Robert Lee Harling to either pay the filing fee or submit a complete motion to proceed in forma pauperis. The court also directs him to file a recast complaint complying with Federal Rules of Civil Procedure 8, 18, and 20, linking each claim to specific defendants and limiting the complaint to related claims and ten pages.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Albany Division
WRITING FOR THE COURT	Alfreda L. Sheppard
JURISDICTION	United States District Court for the Middle District of Georgia, Albany Division
DECIDED	December 9, 2025
DOCKET	1:25-cv-140-LAG-ALS
DISPOSITION	other
PROCEDURAL POSTURE	At the commencement of a pro se prisoner civil-rights action under 42 U.S.C. § 1983, the court ordered the plaintiff either to pay the filing fee or submit a complete application to proceed in forma pauperis, and to file a recast complaint curing pleading, joinder, and defendant-linkage deficiencies.
STANDARD OF REVIEW	The complaint was evaluated under the pleading requirements of Federal Rule of Civil Procedure 8(a)(2), the plausibility standard, and the required preliminary screening framework for prisoner complaints under 28 U.S.C. § 1915A.
PRECEDENTIAL VALUE	nonprecedential district-court order

TOPICS

- section 1983
- pleadings
- joinder
- civil procedure
- prisoners rights

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether Harling was required to pay the filing fee or submit a properly completed in forma pauperis application with the required six-month trust-account statement.
2. Whether the complaint failed to satisfy Rule 8(a)(2) because it consisted primarily of conclusory allegations and constituted a shotgun pleading.
3. Whether Harling was required to file a recast complaint linking each claim to specific defendants and limiting the action to claims satisfying Rule 20's joinder requirements.
4. Whether the court could subpoena or review discovery materials before determining whether the recast complaint stated a claim and survived preliminary screening.

HOLDINGS

1. A prisoner who wishes to proceed in the action must either pay the filing fee or submit a properly completed motion to proceed in forma pauperis, including the required certified six-month trust-fund account statement.
2. Harling must file a recast complaint containing a short and plain statement of his entitlement to relief, with claims and factual allegations stated clearly enough to identify the alleged constitutional violation and responsible defendant.
3. A claim that is not connected to a specific defendant through factual allegations may be dismissed.
4. When multiple defendants are named, claims may be joined only if the plaintiff seeks relief against the defendants jointly, severally, or alternatively based on the same transaction or occurrence or series thereof, and a common question of law or fact will arise.
5. The court would not subpoena or review videos, disciplinary records, or other evidence before the recast complaint underwent the required preliminary screening and survived review.

KEY QUOTATIONS

“A district court may dismiss a complaint as a shotgun pleading under its “inherent authority to control its docket and ensure prompt resolution of lawsuits[.]””

“Plaintiff must establish two prerequisites for joining multiple defendants”

“There will be no service in this case pending further order of the Court.”

FACTUAL BACKGROUND

Harling, a prisoner at Georgia Diagnostic and Classification Prison, alleged that he experienced segregation, an unnecessary use-of-force incident involving taser, medical-rights violations, and other allegedly cruel and unusual conditions. The complaint and attachments did not clearly identify when the alleged events occurred,

which defendants were responsible, or how the various incidents formed legally cognizable claims. Harling also sought court access to videos, disciplinary records, and hearing transcripts before preliminary screening.

PROCEDURAL HISTORY

Robert Lee Harling filed a pro se § 1983 complaint but did not pay the filing fee or submit a complete in forma pauperis application. The court found that the complaint was largely conclusory, failed to connect claims to specific defendants, and appeared to assert unrelated claims against multiple defendants. The court ordered Harling to comply within fourteen days and warned that failure to do so could result in dismissal; no service was ordered pending further court action.

DISPOSITION

other

CASES CITED

- Weiland v. Palm Beach Cnty. Sheriff's Off., 792 F.3d 1313, 1320, 1322-23 (11th Cir. 2015)
- Vibe Micro, Inc. v. Shabanets, 878 F.3d 1291, 1295-96 & n.6 (11th Cir. 2018)
- Wagner v. Daewoo Heavy Indus. Am. Corp., 314 F.3d 541, 542 n.1 (11th Cir. 2002)
- Arrington v. Green, 757 F. App'x 796, 797 (11th Cir. 2018)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Douglas v. Yates, 535 F.3d 1316, 1322 (11th Cir. 2008)
- Smith v. Owens, 625 F. App'x 924, 928 (11th Cir. 2015)
- Rhodes v. Target Corp., 313 F.R.D. 656, 659 (M.D. Fla. 2016)
- Barber v. America's Wholesale Lender, 289 F.R.D. 364, 367 (M.D. Fla. 2013)
- Smith v. Trans-Siberian Orchestra, 728 F. Supp. 2d 1315, 1319 (M.D. Fla. 2010)
- Skillern v. Ga. Dep't of Corr. Comm'r, 379 F. App'x 859, 860 (11th Cir. 2010)