

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Holly Jarvis v. Officer Knapp, et al.

Jarvis · No. 5:25-CV-1167 (MAD/MJK) · Decided December 9, 2025

SUMMARY

The United States District Court for the Northern District of New York adopts a magistrate judge's Report-Recommendation addressing Holly Jarvis's pro se civil-rights claims under 42 U.S.C. § 1983. The court terminates the City of Syracuse Police Department as a defendant, deems Jarvis's amended complaint operative, and recommits it to the magistrate judge for review under 28 U.S.C. § 1915(e).

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Mae A. D'Agostino
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	December 9, 2025
DOCKET	5:25-CV-1167 (MAD/MJK)
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's report-recommendation recommending dismissal without prejudice and with leave to amend, and filed an amended complaint as of right. The district court reviewed the objections, adopted the report-recommendation, terminated the City of Syracuse Police Department as a party, deemed the amended complaint operative, and recommitted the matter to the magistrate judge for screening.
STANDARD OF REVIEW	Specific objections to a magistrate judge's report-recommendation receive de novo review under 28 U.S.C. § 636(b)(1); general, conclusory, or repetitive objections are reviewed for clear error.
PRECEDENTIAL VALUE	unknown
PARTIES	Holly Jarvis v. Officer Knapp, Officer John Doe, and City of Syracuse Police Department

TOPICS

section 1983

pleadings

motion to amend

civil rights

civil procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

municipal liability

QUESTIONS PRESENTED

1. Whether Plaintiff's general and conclusory objections to the magistrate judge's report-recommendation required de novo rather than clear-error review.
2. Whether the report-recommendation should be adopted despite Plaintiff's objections.
3. Whether Plaintiff's amended complaint filed as of right under Federal Rule of Civil Procedure 15(a)(1) became the operative pleading and should be referred for screening.
4. Whether the City of Syracuse Police Department should remain a party to the action.

HOLDINGS

1. General and conclusory objections that merely repeat arguments presented to the magistrate judge are reviewed for clear error rather than de novo.
2. An amended complaint filed as of right under Federal Rule of Civil Procedure 15(a)(1) is the operative pleading and ordinarily supersedes the original complaint, but it must be separately reviewed for pleading sufficiency.
3. The report-recommendation was properly adopted because the district court found no clear error.

KEY QUOTATIONS

"It is well established that an amended complaint ordinarily supersedes the original, and renders it of no legal effect."

"[I]n a pro se case, the court must view the submissions by a more lenient standard than that accorded to 'formal pleadings drafted by lawyers.'"

FACTUAL BACKGROUND

Holly Jarvis brought a pro se § 1983 action against police-related defendants based on alleged illegal search, illegal seizure, excessive force, and retaliation for protected speech. She also sought to impose Monell liability on the City of Syracuse Police Department. After the magistrate judge identified pleading deficiencies and recommended dismissal with leave to amend, Jarvis filed general objections and an amended complaint that changed some factual allegations, substituted Officer Matthewson for Officer Doe, and named the City of Syracuse rather than its police department.

PROCEDURAL HISTORY

Jarvis filed a pro se action under 42 U.S.C. § 1983 alleging Fourth Amendment search, seizure, and excessive-force violations, First Amendment retaliation, and Monell liability. Magistrate Judge Mitchell J. Katz recommended dismissal without prejudice with leave to amend and dismissal of the City of Syracuse Police

Department. Jarvis filed general objections and an amended complaint as of right. The district court reviewed the objections for clear error, found none, adopted the report-recommendation, terminated the police department as a defendant, and referred the amended complaint back to the magistrate judge for review under 28 U.S.C. § 1915(e)(2)(B).

DISPOSITION

remanded

REMAND INSTRUCTIONS

The amended complaint is deemed the operative pleading and is referred to Magistrate Judge Katz for review of its pleading sufficiency pursuant to 28 U.S.C. § 1915(e).

CASES CITED

- Monell v. Dept. of Soc. Servs., 436 U.S. 658 (1978)
- O'Diah v. Mawhir, No. 9:08-CV-322, 2011 WL 933846, at *1 (N.D.N.Y. Mar. 16, 2011)
- Govan v. Campbell, 289 F. Supp. 2d 289, 295 (N.D.N.Y. 2003)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Traguth v. Zuck, 710 F.2d 90, 95 (2d Cir. 1983)
- Shomo v. City of New York, 579 F.3d 176, 183 (2d Cir. 2009)
- Anderson v. Coughlin, 700 F.2d 37, 41 (2d Cir. 1983)
- Townsend v. Pep Boys, Manny Moe and Jack, No. 1:13-CV-293, 2014 WL 4826681, at *2 (N.D.N.Y. Sept. 29, 2014)
- Cuoco v. Moritsugu, 222 F.3d 99, 112 (2d Cir. 2000)
- Brown v. Peters, No. 95-CV-1641, 1997 WL 599355, at *2 (N.D.N.Y. Sept. 22, 1997), aff'd, 175 F.3d 1007 (2d Cir. 1999)
- Syfert v. City of Rome, No. 6:17-CV-0578, 2017 WL 5195230, at *2 (N.D.N.Y. Nov. 9, 2017)
- Paddington Partners v. Bouchard, 34 F.3d 1132, 1137-38 (2d Cir. 1994)
- Pan Am. World Airways, Inc. v. Int'l Bhd. of Teamsters, 894 F.2d 36, 40 n.3 (2d Cir. 1990)
- Shields v. Citytrust Bancorp, Inc., 25 F.3d 1124, 1128 (2d Cir. 1994)
- Int'l Controls Corp. v. Vesco, 556 F.2d 665, 668 (2d Cir. 1977)

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