

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

Kyrima Anderson, et al. v. Warden Jessie Williams, et al.

No. 5:25-cv-00506-MTT-ALS · No. No. 5:25-cv-00506-MTT-ALS · Decided November 21, 2025

SUMMARY

The United States District Court for the Middle District of Georgia dismissed without prejudice a pro se prisoner’s purported class-action complaint filed on behalf of herself and other prisoners. The court held that a pro se prisoner cannot adequately represent a class and advised that each prisoner may file a separate complaint asserting personal claims.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Macon Division
WRITING FOR THE COURT	Marc T. Treadwell
JURISDICTION	United States District Court for the Middle District of Georgia, Macon Division
DECIDED	November 21, 2025
DOCKET	No. 5:25-cv-00506-MTT-ALS
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner filed a purported class-action complaint on behalf of herself and other prisoners. The district court dismissed the complaint without prejudice because a pro se prisoner cannot adequately represent a class.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Kyrima Anderson, et al. v. Warden Jessie Williams, et al.

TOPICS

- class actions
- prisoners rights
- civil rights
- civil procedure

PRACTICE AREAS

- Civil procedure
- Civil rights litigation
- Prisoner litigation
- Class actions

QUESTIONS PRESENTED

1. Whether a pro se prisoner may serve as an adequate class representative and litigate claims on behalf of other prisoners.

HOLDINGS

1. A pro se prisoner cannot serve as an adequate class representative or litigate on behalf of fellow prisoners in a federal class action.

KEY QUOTATIONS

“Accordingly, the Court DISMISSES this Complaint without prejudice. Each Plaintiff may file their own separate complaint asserting claims that are personal to that prisoner and for which they will be individually responsible for filing fees.” (Order of Dismissal)

“The right to appear pro se ... is limited to parties conducting their own cases, and does not extend to non-attorney parties representing the interests of others.” (Order of Dismissal)

“Here, Plaintiff is a prisoner proceeding pro se, and thus, the Court cannot find she is an adequate representative that can litigate on behalf of her fellow prisoners in a federal lawsuit.” (Order of Dismissal)

FACTUAL BACKGROUND

Kyrima Anderson, a prisoner at Pulaski State Prison in Hawkinsville, Georgia, filed a purported class-action complaint on behalf of herself and other prisoners at Pulaski State Prison and Emmanuel Women's Facility. She was proceeding without counsel. The court concluded that, because she was a pro se prisoner, she could not adequately represent the interests of other prisoners in a federal class action.

PROCEDURAL HISTORY

Kyrima Anderson, a prisoner proceeding pro se, filed a class-action complaint concerning prisoners at Pulaski State Prison and Emmanuel Women's Facility. The district court dismissed the complaint without prejudice and stated that each prisoner could file a separate complaint asserting claims personal to that prisoner.

DISPOSITION

dismissed

CASES CITED

- *FuQua v. Massey*, 615 F. App'x 611, 612 (11th Cir. 2015) (per curiam)
- *Timson v. Sampson*, 518 F.3d 870, 873 (11th Cir. 2008)
- *Johnson v. Brown*, 581 F. App'x 777, 781 (11th Cir. 2014)
- *Bass v. Benton*, 408 F. App'x 298 (11th Cir. 2011) (per curiam)
- *Wallace v. Smith*, 145 F. App'x 300, 302 (11th Cir. 2005) (per curiam)
- *Oxendine v. Williams*, 509 F.2d 1405, 1407 (4th Cir. 1975)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION KYRIMA ANDERSON, et al.: Plaintiffs, VS.: NO. 5:25-cv-00506-MTT-
ALS Warden JESSIE WILLIAMS, et al.,: Defendants.: _____:
ORDER OF DISMISSAL Pro se Plaintiff Kyrima Anderson, a prisoner at Pulaski State Prison in
Hawkinsville, Georgia, has filed a “class-action complaint” on behalf of herself and other
prisoners held at Pulaski State Prison as well as at Emmanuel Women’s Facility.

ECF No. 1. However, a prerequisite for class action certification is a finding by the Court that the
representative party can “fairly and adequately protect the interest of the class.” Fed. R. Civ. P.
23(a)(4). Circuit Courts have repeatedly held a pro se plaintiff is not an adequate class
representative and may not litigate on behalf of others. See e.g. *FuQua v. Massey*, 615 F. App’x
611, 612 (11th Cir.

2015) (per curiam) (“The right to appear pro se ... is limited to parties conducting their own cases,
and does not extend to non-attorney parties representing the interests of others.” (internal
quotation marks omitted)); *Timson v. Sampson*, 518 F.3d 870, 873 (11th Cir. 2008) (holding that
the personal right to proceed pro se established under 28 U.S.C. § 1654 “does not extend to the
representation of the interests of others.”); *Johnson v. Brown*, 581 F. App’x 777, 781 (11th Cir.

2014) (finding pro se litigant cannot bring an action on behalf of fellow inmates); *Bass v. Benton*,
408 F. App’x 298 (11th Cir. 2011) (per curiam) (affirming dismissal of pro se former prisoner’s §
1983 class action because “the general provision permitting parties to proceed pro se” does not
provide “a personal right that... extend[s] to the representation of the interests of others”); *Wallace*
v. Smith, 145 F. App’x 300, 302 (11th Cir.

2005) (per curiam) (citing *Oxendine v. Williams*, 509 F.2d 1405, 1407 (4th Cir. 1975) (finding it
“plain error to permit [an] imprisoned litigant who is unassisted by counsel to represent his fellow
inmates in a class action”).

Here, Plaintiff is a prisoner proceeding pro se, and thus, the Court cannot find she is an adequate
representative that can litigate on behalf of her fellow prisoners in a federal lawsuit. Accordingly,
the Court DISMISSES this Complaint without prejudice. Each Plaintiff may file their own
separate complaint asserting claims that are personal to that prisoner and for which they will be
individually responsible for filing fees.

SO ORDERED, this 21st day of November, 2025. S/ Marc T. Treadwell MARC T. TREADWELL,
JUDGE UNITED STATES DISTRICT COURT