

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, SOUTHERN DIVISION

Ryan Lee Hartman v. Samson Municipal Courts, et al.

Ryan Lee Hartman v. Samson Municipal Courts, No. 1:24-CV-766-WKW (M.D. Ala. Dec. 2, 2025) · No. 1:24-CV-766-WKW · Decided December 2, 2025

SUMMARY

The United States District Court for the Middle District of Alabama dismissed without prejudice Ryan Lee Hartman’s pro se action under 42 U.S.C. § 1983. The court found that Hartman failed to notify the court of his release from custody, did not respond to a show-cause order, and failed to cure pleading deficiencies identified in an earlier order. The dismissal was entered under the court’s inherent authority and Federal Rule of Civil Procedure 41(b), with final judgment to follow separately.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Southern Division
WRITING FOR THE COURT	W. Keith Watkins
JURISDICTION	United States District Court for the Middle District of Alabama, Southern Division
DECIDED	December 2, 2025
DOCKET	1:24-CV-766-WKW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff brought a 42 U.S.C. § 1983 action and sought leave to proceed in forma pauperis. After granting in forma pauperis status and directing plaintiff to amend his complaint, the court dismissed the action without prejudice for failure to obey a court order, failure to respond to a show-cause order, and failure to cure pleading deficiencies.
STANDARD OF REVIEW	Abuse of discretion applies to dismissal as a sanction for failure to obey court orders or prosecute; dismissal without prejudice under the court's inherent authority does not require a finding of willfulness or bad faith.
PRECEDENTIAL VALUE	Unpublished district court order; [WO] designation appears in the caption.

TOPICS

sanctions

civil procedure

pleadings

section 1983

PRACTICE AREAS

Civil procedure

Civil rights

Federal courts

Prisoner litigation

QUESTIONS PRESENTED

1. Whether the district court could dismiss the action without prejudice under its inherent authority and Federal Rule of Civil Procedure 41(b) for plaintiff's failure to obey court orders and failure to prosecute.
2. Whether dismissal was warranted because plaintiff failed to respond to the show-cause order and failed to cure the pleading deficiencies identified in the order directing amendment.

HOLDINGS

1. A district court may dismiss an action without prejudice under its inherent docket-management authority and Federal Rule of Civil Procedure 41(b) when a plaintiff fails to obey court orders or prosecute the action; unlike dismissal with prejudice, dismissal without prejudice does not require a finding of willfulness or bad faith.
2. Dismissal without prejudice was warranted because plaintiff failed to notify the court of his release, failed to respond to the show-cause order, and failed to correct the pleading deficiencies identified in the order directing amendment.

KEY QUOTATIONS

"A district court "may . . . dismiss a case under its inherent authority, which it possesses as a means of managing its own docket so as to achieve the orderly and expeditious disposition of cases.""

"A dismissal without prejudice, by contrast, doesn't require a finding of willfulness or bad faith because its consequences are less severe."

FACTUAL BACKGROUND

Hartman filed a pro se § 1983 complaint while incarcerated and was later released from custody on March 20, 2025 after pleading guilty to fraudulent use of a credit or debit card. He did not notify the court or defendants of his release despite an order requiring notice of address changes. He also failed to respond to the court's show-cause order and submitted an amended complaint that continued to contain vague factual allegations and legal conclusions.

PROCEDURAL HISTORY

Plaintiff initially filed a § 1983 complaint and an application to proceed in forma pauperis without an inmate account statement. The court ordered him to provide the statement, granted in forma pauperis status after he complied, and later ordered him to file an amended complaint. After plaintiff was released from custody without notifying the court as required, the court issued a show-cause order; plaintiff did not respond. The court also

found that the amended complaint failed to cure the deficiencies identified in the amendment order and dismissed the action without prejudice.

DISPOSITION

dismissed

CASES CITED

- State v. Hartman, Case No. CC-2025-32.00 (Geneva Cnty. Cir. Ct. Mar. 20, 2025), Doc. Nos. 29, 31
- McNair v. Johnson, 143 F.4th 1301, 1306–07 (11th Cir. 2025)
- Link v. Wabash R.R. Co., 370 U.S. 626, 629–30 (1962)
- Moon v. Newsome, 863 F.2d 835, 837 (11th Cir. 1989)
- Mingo v. Sugar Cane Growers Co-Op of Fla., 864 F.2d 101, 102 (11th Cir. 1989) (per curiam)
- Goforth v. Owens, 766 F.2d 1533, 1535 (11th Cir. 1985)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION RYAN LEE HARTMAN,)) Plaintiff,)) v.) CASE NO. 1:24-CV-766-
WKW) [WO] SAMSON MUNICIPAL COURTS,) et al.,)) Defendants.) ORDER Plaintiff Ryan
Lee Hartman filed a pro se complaint pursuant to 42 U.S.C. § 1983 (Doc. # 1) and simultaneously
filed an application to proceed in forma pauperis (Doc. # 2).

However, Plaintiff failed to submit an inmate account statement along with his application to
proceed in forma pauperis. Accordingly, by Order dated December 13, 2024, Plaintiff was directed
to file his inmate account statement (“December 13 Order”). (Doc. # 4.)

The December 13 Order expressly cautioned Plaintiff that he must inform the court and
Defendants (or Defendants’ counsel) of any change of address and that a failure to do so would
result in dismissal of this action. (See Doc. # 4 at 2.)

After Plaintiff filed his inmate account statement (Doc. # 5), Plaintiff was granted leave to proceed
in forma pauperis (Doc. # 6). Thereafter, by Order dated January 8, 2025, Plaintiff was directed to
file an amended complaint (“Amend Order”). (Doc. # 7.)

In response, Plaintiff filed an amended complaint. (Doc. # 8.) For the reasons to follow, this action
will be dismissed without prejudice. First, upon review of Plaintiff’s amended complaint, his state-
court case records indicate that he was released from custody on March 20, 2025 after pleading
guilty to the fraudulent use of credit/debit card. See State v. Hartman, Case No. CC- 2025-32.00
(Geneva Cnty.

Cir. Ct. Mar. 20, 2025), Doc. Nos. 29, 31. Because Plaintiff had failed to comply with the portion of the December 13 Order directing him to notify the court of a change of address, the court issued an Order dated October 27, 2025 (“Show-Cause Order”), directing Plaintiff to show cause as to why this action should not be dismissed for his failure to obey a court order (i.e., inform the court and Defendants or Defendants’ counsel of his release from jail).

(Doc. # 9.) Second, the Show-Cause Order set a November 17, 2025 deadline for Plaintiff to respond and show cause as to why this action should not be dismissed. (Doc. # 9.) To date, Plaintiff has not responded to the Show-Cause Order.

Third and finally, Plaintiff’s amended complaint fails to correct the pleading deficiencies identified in the Amend Order. The Amend Order first provides the two elements that Plaintiff must allege to state a claim under 42 U.S.C. § 1983: “(1) a right secured by the Constitution or laws of the United States was violated and (2) the violation was committed by a person acting under the color of state law.” (Doc. # 7 at 1.)

The Amend Order also states that Plaintiff names several defendants against whom he asserts vague and imprecise factual allegations and legal conclusions.... mak[ing] it difficult to discern the claims being presented and against whom each claim is made, why each factual allegation is legally significant, and how the alleged facts represent violations of Plaintiff’s constitutional rights.

(Doc. # 7 at 2.) The Amend Order then provides Plaintiff with step-by-step instructions on how to amend his complaint. (Doc. # 7 at 2.) The only real difference between Plaintiff’s original and amended complaints is his original complaint names Andy Tew of the Samson Police Department as a Defendant whereas his amended complaint does not. (Compare Doc. # 1 at 1, 2 with Doc. # 8 at 2–3.)

Additionally, his amended complaint lists the rights he claims were violated by Defendants as “false imprisonment” and “intentional infliction of emotional distress.” (Doc. # 8 at 3; cf. Doc. # 1 at 2–3 (alleging unlawful arrest and imprisonment, recklessness, negligence, and carelessness).) Overall, Plaintiff continues to assert “vague and imprecise factual allegations and legal conclusions” and thus has failed to correct the pleading deficiencies identified in the Amend Order.

A district court “may... dismiss a case under its inherent authority, which it possesses as a means of managing its own docket so as to achieve the orderly and expeditious disposition of cases.” *McNair v. Johnson*, 143 F.4th 1301, 1306–07 (11th Cir. 2025) (cleaned up).

The authority of courts to impose sanctions for failure to comply with court orders and failure to prosecute is longstanding and acknowledged by Rule 41(b) of the Federal Rules of Civil Procedure. *Link v. Wabash R.R. Co.*, 370 U.S. 626, 629–30 (1962); see also *Moon v. Newsome*,

863 F.2d 835, 837 (11th Cir. 1989) (noting that “dismissal upon disregard of an order, especially where the litigant has been forewarned, generally is not an abuse of discretion”).

A court’s dismissal under its inherent authority “can be either with or without prejudice to refiling.” McNair, 143 F.4th at 1306. Dismissal with prejudice as a sanction “is warranted only upon a ‘clear record of delay or willful contempt and a finding that lesser sanctions would not suffice.’” Mingo v. Sugar Cane Growers Co- Op of Fla., 864 F.2d 101, 102 (11th Cir.

1989) (per curiam) (emphasis omitted) (quoting Goforth v. Owens, 766 F.2d 1533, 1535 (11th Cir. 1985)); accord McNair, 143 F.4th at 1306. “A dismissal without prejudice, by contrast, doesn’t require a finding of willfulness or bad faith because its consequences are less severe.” McNair, 143 F.4th at 1306. Based on the foregoing, it is ORDERED that this action is DISMISSED without prejudice.

Final Judgment will be entered separately. DONE this 2nd day of December, 2025. /s/ W. Keith Watkins UNITED STATES DISTRICT JUDGE